

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

IN RE NATIONAL PRESCRIPTION  
OPIATE LITIGATION

This document relates to:  
Case No. 1:18-op-45817-DAP

COBB COUNTY,

Plaintiff,

vs.

PURDUE PHARMA L.P., et al.,

Defendants.

MDL No. 2804

Case No. 17-md-2804

Judge Dan Aaron Polster

**WALMART INC.'S ANSWER AND AFFIRMATIVE DEFENSES TO PLAINTIFF'S  
SUPPLEMENTAL AND AMENDED ALLEGATIONS TO BE ADDED TO SHORT  
FORM FOR SUPPLEMENTING COMPLAINT AND AMENDING DEFENDANTS**

Defendant Walmart Inc. ("Walmart")<sup>1</sup> hereby answers the Supplemental and Amended Allegations to Be Added to Short Form for Supplementing Complaint and Amending Defendants and Jury Demand ("Supplemental Short Form Complaint") filed in the case of *Cobb County v. Purdue Pharma L.P. et al*, Case No. 1:18-op-45817-DAP (*In re Nat'l Prescription Opiate Litig.*, Case No. 17-md-2804 (N.D. Ohio), ECF No. 3787).<sup>2</sup>

---

<sup>1</sup> Walmart Inc. files this answer on behalf of the following Walmart-affiliated entities named as defendants in Plaintiff's Supplemental and Amended Allegations to Be Added to Short Form for Supplementing Complaint and Amending Defendants and Jury Demand: Walmart Inc., Wal-Mart Stores East, LP; WSE Management, LLC; WSE Investment, LLC; Wal-Mart Stores East, LLC; Sam's East, Inc.; and Sam's West, Inc.

<sup>2</sup> Pursuant to Paragraph 4 of the Stipulated Order Regarding Answering The May 19, 2021 Amended Complaints In The Five New Pharmacy Bellwether Cases entered August 17, 2021 (MDL Dkt. 3853), (1) "Defendants shall only be required to answer the allegations set forth in the" Supplemental Short Form Complaint; (2) Defendants "shall have no obligation to answer any prior complaints and pleadings incorporated by reference into the [Supplemental Short Form Complaint];" (3) by not answering any prior complaints and pleadings, "Defendants do not admit any of the allegations in those prior complaints or pleadings and reserve all defenses to the claims and allegations of the prior complaints or pleadings;" and (4) the Defendants' "failure to answer any prior complaint or pleading in responding to the allegations of the Amended Complaint shall not be construed as an admission of any allegation in those prior complaints or pleadings and shall not be a basis for a default judgment with respect to any claims asserted in those

Unless expressly stated otherwise, Walmart denies each and every allegation in the Complaint, including any allegations in the preamble, unnumbered and numbered paragraphs, titles, headings, subheadings, table of contents, footnotes, exhibits, characterization of documents, and stricken paragraphs, and specifically denies any liability to Plaintiff. To the extent not expressly denied, all allegations for which Walmart denies possessing knowledge or information sufficient to form a belief are denied. Walmart reserves the right to seek to amend and supplement its Answer as may be appropriate or necessary.

1. Paragraph 1 summarizes Plaintiff's claims and does not require a response. To the extent Paragraph 1 contains allegations of wrongdoing, Walmart denies such allegations. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

2. Paragraph 2 summarizes Plaintiff's claims and does not require a response. To the extent Paragraph 2 contains allegations of wrongdoing, Walmart denies such allegations. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

3. Pursuant to Paragraph 4 of the Stipulated Order Regarding Answering The May 19, 2021 Amended Complaints In The Five New Pharmacy Bellwether Cases entered August 17, 2021 (MDL Dkt. 3853), Walmart is only required to answer the allegations set forth in this Complaint and does not respond to any allegations in Plaintiff's prior complaints and pleadings including Plaintiff's Original Complaint (ECF 1), its Amended Short Form Complaint (ECF 6), or any other

---

prior complaints or pleadings." Consistent with that Order, Walmart answers only the allegations set forth in Plaintiff's Supplemental Short Form Complaint.

complaints or pleadings that Plaintiff purports to incorporate herein. Walmart does not admit any allegation contained in any of Plaintiff's prior complaints and pleadings. Answering further, to the extent any of Plaintiff's prior pleadings contain allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

4. Walmart acknowledges that abuse and addiction to opioids is a serious public health issue. Walmart denies the allegations in Paragraph 4 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 4, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

5. Walmart acknowledges that abuse and addiction to opioids is a serious public health issue. Walmart denies the allegations in Paragraph 5 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 5; such allegations are therefore deemed to be denied.

6. Walmart denies the allegations in Paragraph 6 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 6, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

7. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 7; such allegations are therefore deemed to be denied.

8. Walmart denies the allegations in Paragraph 8 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth

of the allegations in Paragraph 8, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

9. While Walmart is aware of reports regarding drug overdose, Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 9; such allegations are therefore deemed to be denied.

10. While Walmart is aware of reports regarding drug overdose, Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 10; such allegations are therefore deemed to be denied.

11. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 11; such allegations are therefore deemed to be denied.

12. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 12; such allegations are therefore deemed to be denied.

13. To the extent Paragraph 13 refers to documents,<sup>3</sup> those documents speak for themselves, and Walmart denies any characterizations thereof. Walmart admits that, according to [www.whitehouse.gov](http://www.whitehouse.gov), the President declared the opioid crisis a national public health emergency on October 26, 2017. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 13, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

---

<sup>3</sup> As used by Walmart in this Answer, “document” and/or documents” include, without limitation, writings, recordings, photographs, and electronically stored information, as well as websites, message boards, videos, CME presentations and materials, programs, literature, and all other sources used in support of each allegation.

14. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 14; such allegations are therefore deemed to be denied.

15. Walmart acknowledges that abuse and addiction to opioids is a serious public health issue. Walmart denies the allegations in Paragraph 15 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 15, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

16. Walmart denies the allegations in Paragraph 16 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 16, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

17. Paragraph 17 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Paragraph 17 also states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 17 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 17, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

18. Paragraph 18 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 18 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the

allegations in Paragraph 18, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

19. While Walmart is aware of reports regarding drug overdose, Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 19; such allegations are therefore deemed to be denied.

20. Paragraph 20 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 20 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 20, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

21. Paragraph 21 refers to documents that speak for themselves, and Walmart denies any characterizations thereof. Further, Paragraph 21 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 21 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 21, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

22. Paragraph 22 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 22 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 22, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

23. Walmart denies the allegations in Paragraph 23 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 23, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

24. Walmart denies the allegations in Paragraph 24 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 24, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

25. Walmart denies the allegations in Paragraph 25 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 25, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

26. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 26; such allegations are therefore deemed to be denied.

27. Paragraph 27 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 27 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 27, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

28. Paragraph 28 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 28 and

further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 28, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

29. Paragraph 29 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 29 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 29, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

30. Paragraph 30 states legal conclusions to which no response is required. Walmart admits that it is not aware of a reason or basis to dispute the personal jurisdiction of this Court over Walmart for the claims asserted in the Complaint. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 30, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

31. Paragraph 31 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 31 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 31, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.



32. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 32; such allegations are therefore deemed to be denied.

33. The allegations in Paragraph 33 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 33 is deemed to contain allegations against Walmart, Walmart denies such allegations.

34. The allegations in Paragraph 34 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 34 is deemed to contain allegations against Walmart, Walmart denies such allegations.

35. The allegations in Paragraph 35 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 35 is deemed to contain allegations against Walmart, Walmart denies such allegations.

36. The allegations in Paragraph 36 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 36 is deemed to contain allegations against Walmart, Walmart denies such allegations.

37. The allegations in Paragraph 37 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 37 is deemed to contain allegations against Walmart, Walmart denies such allegations.

38. The allegations in Paragraph 38 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 38 is deemed to contain allegations against Walmart, Walmart denies such allegations.

39. The allegations in Paragraph 39 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 39 is deemed to contain allegations against Walmart, Walmart denies such allegations.

40. The allegations in Paragraph 40 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 40 is deemed to contain allegations against Walmart, Walmart denies such allegations.

41. The allegations in Paragraph 41 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 41 is deemed to contain allegations against Walmart, Walmart denies such allegations.

42. The allegations in Paragraph 42 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 42 is deemed to contain allegations against Walmart, Walmart denies such allegations.

43. The allegations in Paragraph 43 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 43 is deemed to contain allegations against Walmart, Walmart denies such allegations.

44. The allegations in Paragraph 44 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 44 is deemed to contain allegations against Walmart, Walmart denies such allegations.

45. The allegations in Paragraph 45 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 45 is deemed to contain allegations against Walmart, Walmart denies such allegations.

46. The allegations in Paragraph 46 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 46 is deemed to contain allegations against Walmart, Walmart denies such allegations.

47. The allegations in Paragraph 47 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 47 is deemed to contain allegations against Walmart, Walmart denies such allegations.

48. The allegations in Paragraph 48 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 48 is deemed to contain allegations against Walmart, Walmart denies such allegations.

49. The allegations in Paragraph 49 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 49 is deemed to contain allegations against Walmart, Walmart denies such allegations.

50. The allegations in Paragraph 50 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 50 is deemed to contain allegations against Walmart, Walmart denies such allegations.

51. The allegations in Paragraph 51 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 51 is deemed to contain allegations against Walmart, Walmart denies such allegations.

52. The allegations in Paragraph 52 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 52 is deemed to contain allegations against Walmart, Walmart denies such allegations.

53. The allegations in Paragraph 53 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 53 is deemed to contain allegations against Walmart, Walmart denies such allegations.

54. The allegations in Paragraph 54 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 54 is deemed to contain allegations against Walmart, Walmart denies such allegations.

55. The allegations in Paragraph 55 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 55 is deemed to contain allegations against Walmart, Walmart denies such allegations.

56. The allegations in Paragraph 56 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 56 is deemed to contain allegations against Walmart, Walmart denies such allegations.

57. The allegations in Paragraph 57 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 57 is deemed to contain allegations against Walmart, Walmart denies such allegations.

58. The allegations in Paragraph 58 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 58 is deemed to contain allegations against Walmart, Walmart denies such allegations.

59. The allegations in Paragraph 59 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 59 is deemed to contain allegations against Walmart, Walmart denies such allegations.

60. The allegations in Paragraph 60 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 60 is deemed to contain allegations against Walmart, Walmart denies such allegations.

61. The allegations in Paragraph 61 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 61 is deemed to contain allegations against Walmart, Walmart denies such allegations.

62. The allegations in Paragraph 62 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 62 is deemed to contain allegations against Walmart, Walmart denies such allegations.

63. The allegations in Paragraph 63 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 63 is deemed to contain allegations against Walmart, Walmart denies such allegations.

64. The allegations in Paragraph 64 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 64 is deemed to contain allegations against Walmart, Walmart denies such allegations.

65. Walmart admits that Walmart Inc. (formerly known as Wal-Mart Stores, Inc.) is a Delaware corporation with a principal place of business in Bentonville, Arkansas.

66. Walmart admits that Wal-Mart Stores East, LP is a Delaware limited partnership with a principal place of business in Bentonville, Arkansas.

67. Walmart admits that Sam's East, Inc. d/b/a Sam's Club, is an Arkansas corporation with its principal place of business in Bentonville, Arkansas. Walmart further admit that Sam's West, Inc. d/b/a Sam's Club is an Arkansas corporation with its principal place of business in Bentonville, Arkansas. Walmart further admits that Sam's East Inc. is an indirectly, wholly owned subsidiary of Walmart Inc. and that the sole shareholder of Sam's East, Inc. is Sam's West, Inc. Walmart admits that both Sam's East, Inc. and Sam's West, Inc. operate Sam's Club stores in various locations. Walmart denies any remaining allegations of Paragraph 67.

68. Walmart admits that Sam's West, Inc. is a wholly owned subsidiary of Walmart. Walmart further admits that Sam's West, Inc. is the sole shareholder of Sam's East, Inc.

69. Walmart admits that WSE Management, LLC is a Delaware limited liability company. Walmart also admits that WSE Management, LLC owns one percent of Wal-Mart Store East, LP.



70. Walmart admits that WSE Investment, LLC is a Delaware limited liability company. Walmart also admits that WSE Investment, LLC owns ninety-nine percent of Wal-Mart Store East, LP.

71. Walmart admits that Wal-Mart Stores East, LLC (formerly known as Wal-Mart Stores East, Inc.) is an Arkansas limited liability company. Walmart also admits that Wal-Mart Stores East, LLC is the sole member of both WSE Management, LLC and WSE Investment, LLC.

72. Walmart admits that Walmart Inc. is the sole member of Wal-Mart Stores East, LLC (formerly known as Wal-Mart Stores East, Inc.).

73. Paragraph 73 purports to recite the shorthand terms that Plaintiff defines for its use in its Complaint, and such allegations do not require a response from Walmart. To the extent Paragraph 73 contains allegations of wrongdoing, Walmart denies such allegations.

74. Walmart admits that Walmart, through its subsidiary, distributes certain prescription medication to certain pharmacies operated by Walmart and/or subsidiaries thereof. Walmart also admits that it dispenses certain prescription medication to customers of retail pharmacies operated by Walmart and/or its subsidiaries with valid prescriptions. Walmart denies the remaining allegations in Paragraph 74.

75. Walmart admits that for a time period prior to May 2018, Walmart, through its subsidiary, distributed certain prescription opioid medication to certain pharmacies operated by Walmart and/or subsidiaries thereof located in Georgia and Cobb County. Walmart also admits that at times relevant to this litigation it dispensed certain prescription opioid medication to customers of retail pharmacies operated by Walmart and/or its subsidiaries in Georgia and Cobb County with valid prescriptions. Walmart denies the remaining allegations in Paragraph 75.

76. The allegations in Paragraph 76 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 76 is deemed to contain allegations against Walmart, Walmart denies such allegations.

77. The allegations in Paragraph 77 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 77 is deemed to contain allegations against Walmart, Walmart denies such allegations.

78. The allegations in Paragraph 78 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 78 is deemed to contain allegations against Walmart, Walmart denies such allegations.

79. The allegations in Paragraph 79 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 79 is deemed to contain allegations against Walmart, Walmart denies such allegations.

80. The allegations in Paragraph 80 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 80 is deemed to contain allegations against Walmart, Walmart denies such allegations.

81. The allegations in Paragraph 81 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 81 is deemed to contain allegations against Walmart, Walmart denies such allegations.

82. The allegations in Paragraph 82 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 82 is deemed to contain allegations against Walmart, Walmart denies such allegations.

83. The allegations in Paragraph 83 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 83 is deemed to contain allegations against Walmart, Walmart denies such allegations.

84. The allegations in Paragraph 84 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 84 is deemed to contain allegations against Walmart, Walmart denies such allegations.

85. Paragraph 85 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 85 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 85, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

86. Paragraph 86 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 86 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 86, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

87. Walmart admits that opioids are a class of substances that include legal prescription medication such as pain relievers. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 87; such allegations are therefore deemed to be denied.

88. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 88; such allegations are therefore deemed to be denied.

89. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 89; such allegations are therefore deemed to be denied.

90. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 90; such allegations are therefore deemed to be denied.

91. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 91; such allegations are therefore deemed to be denied.

92. Walmart admits that during some time periods some opioids have been regulated as Schedule II controlled substances. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 92; such allegations are therefore deemed to be denied.

93. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 93; such allegations are therefore deemed to be denied.

94. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 94; such allegations are therefore deemed to be denied.

95. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 95; such allegations are therefore deemed to be denied.

96. Walmart denies the allegations in Paragraph 96 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 96, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

97. Walmart denies the allegations in Paragraph 97 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 97, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

98. Paragraph 98 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 98 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 98, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

99. Walmart denies the allegations in Paragraph 99 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 99, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

100. Walmart admits that it does business in many parts of the United States. Walmart further admits that for a time period prior to May 2018, Walmart, through its subsidiary, distributed certain prescription opioid medication to certain retail pharmacies operated by Walmart and/or its subsidiaries. Walmart also admits that it dispensed certain prescription opioid medication to customers of retail pharmacies operated by Walmart and/or its subsidiaries with valid prescriptions. Walmart denies the remaining allegations in Paragraph 100 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 100, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

101. Paragraph 101 purports to compile governmentally-disclosed ARCOS data which speaks for itself, and Walmart denies any characterization thereof. Further, Paragraph 101 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 101 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 101, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

102. Walmart admits that at all times relevant to this litigation, it possessed certain data on prescription medication it distributed and dispensed. Walmart denies the remaining allegations in Paragraph 102 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 102, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

103. Paragraph 103 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 103 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 103, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

104. Paragraph 104 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 104 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is

otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 104, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

105. Paragraph 105 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 105 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 105, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

106. Walmart denies the allegations in Paragraph 106 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 106, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

107. Walmart denies the allegations in Paragraph 107 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 107, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

108. Walmart denies the allegations in Paragraph 108 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 108, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

109. Walmart denies the allegations in Paragraph 109 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to



the truth of the allegations in Paragraph 109, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

110. Walmart denies the allegations in Paragraph 110 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 110, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

111. Paragraph 111 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 111 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 111, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

112. Paragraph 112 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 112 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 112, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

113. Paragraph 113 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 113 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the

allegations in Paragraph 113, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

114. Paragraph 114 purports to recite law that speaks for itself, and Walmart denies any characterizations thereof. Paragraph 114 also states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 114. Further, to the extent Paragraph 114 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 114, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

115. Paragraph 115 purports to recite law that speaks for itself, and Walmart denies any characterizations thereof. Paragraph 115 also states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 115. Further, to the extent Paragraph 115 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 115, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

116. Paragraph 116 purports to recite law that speaks for itself, and Walmart denies any characterizations thereof. Paragraph 116 also states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 116. Walmart admits that the pharmacies operated by Walmart and/or its subsidiaries

are registrants under the Controlled Substances Act. Further, to the extent Paragraph 116 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

117. Paragraph 117 refers to documents that speak for themselves, and Walmart denies any characterizations thereof. Answering further, Paragraph 117 purports to recite law that speaks for itself, and Walmart denies any characterizations thereof. Paragraph 117 also states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 117. Answering further, to the extent Paragraph 117 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

118. Paragraph 118 purports to recite law that speaks for itself, and Walmart denies any characterizations thereof. Paragraph 118 also states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 118. Walmart admits that the pharmacies operated by Walmart and/or its subsidiaries are registrants under the Controlled Substances Act. Further, to the extent Paragraph 118 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

119. Paragraph 119 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 119 and further denies the allegations contained therein to the extent they apply to Walmart. Further, to the extent Paragraph 119 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 119, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

120. Paragraph 120 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 120 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 120, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

121. Paragraph 121 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 121 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 121, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

122. Paragraph 122 purports to recite law that speaks for itself, and Walmart denies any characterizations thereof. Paragraph 122 also states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 122. Further, to the extent Paragraph 122 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

123. Paragraph 123 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 123 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 123, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

124. Paragraph 124 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 124 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 124, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

125. Paragraph 125 purports to recite law that speaks for itself, and Walmart denies any characterizations thereof. Paragraph 125 also states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 125. Further, to the extent Paragraph 125 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

126. Paragraph 126 purports to recite law that speaks for itself, and Walmart denies any characterizations thereof. Paragraph 126 also states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 126. Further, to the extent Paragraph 126 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

127. Walmart admits that at times relevant to this litigation, it possessed certain data on prescription medication it distributed and dispensed, including both controlled and non-controlled substances. Walmart denies the remaining allegations in Paragraph 127.

128. Paragraph 128 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 128 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 128, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

129. Paragraph 129 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, Paragraph 129 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 129 and further denies the allegations contained therein.

130. Paragraph 130 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 130 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 130, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

131. Paragraph 131 purports to recite law that speaks for itself, and Walmart denies any characterizations thereof. Paragraph 131 also states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 131. Further, to the extent Paragraph 131 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

132. Paragraph 132 purports to recite law that speaks for itself, and Walmart denies any characterizations thereof. Paragraph 132 also states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 132. Answering further, to the extent Paragraph 132 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

133. Paragraph 133 purports to recite law that speaks for itself, and Walmart denies any characterizations thereof. To the extent Paragraph 133 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

134. Paragraph 134 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 134 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 134, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

135. Paragraph 135 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 135 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 135, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

136. Paragraph 136 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 136 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 136, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

137. Paragraph 137 purports to recite law that speaks for itself, and Walmart denies any characterizations thereof. Paragraph 137 also states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 137. Answering further, to the extent Paragraph 137 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

138. Paragraph 138 purports to recite law and refer to documents that speak for themselves, and Walmart denies any characterizations thereof. Answering further, Paragraph 138 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 138 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 138, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

139. Walmart admits that Georgia participates in a Prescription Monitoring Program. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 139; such allegations are therefore deemed to be denied.

140. Walmart admits that PMDPs provide certain information. Answering further, Paragraph 140 refers to documents that speaks for themselves, and Walmart denies any characterizations thereof. Answering further, the allegations in Paragraph 140 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 140 is deemed to contain allegations against Walmart, Walmart denies such allegations.

141. Walmart admits that at all times relevant to this litigation, it possessed certain data on prescription medication its pharmacists dispensed, including both controlled and non-controlled substances. Answering further, Paragraph 141 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 141 and further denies the allegations contained therein to the extent they apply to



Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 141, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

142. Paragraph 142 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 142 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 142, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

143. Paragraph 143 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 143 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 143, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

144. Paragraph 144 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 144 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 144, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

145. Paragraph 145 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 145 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is

otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 145, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied. Further, to the extent Paragraph 145 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

146. Paragraph 146 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 146 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 149, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

147. Walmart denies the allegations in Paragraph 147 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 147, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

148. Walmart admits that at times relevant to this litigation, it was a member of NACDS. Walmart also admits that at certain times, certain Walmart employees have served on the NACDS Board of Directors. Paragraph 148 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 148 to the extent they apply to Walmart, including that Walmart is or was a member of HDA and/or its predecessors HDMA and NWDA. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 148, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

149. Walmart admits that HDA is a trade association that represents wholesale distributors. Walmart also admits that HDA has at certain times worked together with NACDS on

certain issues. Walmart denies that it is or was a member of HDA and/or its predecessors HDMA and NWDA. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 149, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

150. Paragraph 150 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 150, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

151. Paragraph 151 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 151 to the extent they apply to Walmart, including that Walmart is or was a member of HDA and/or its predecessors HDMA and NWDA. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 151, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

152. Paragraph 152 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 152 to the extent they apply to Walmart, including that Walmart is or was a member of HDA and/or its predecessors HDMA and NWDA. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 152, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

153. Paragraph 153 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 153 to the extent they apply to Walmart, including that Walmart is or was a member of HDA and/or its predecessors

HDMA and NWDA. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 153, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

154. Paragraph 154 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 154 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 154, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

155. Paragraph 155 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 155; such allegations are therefore deemed to be denied.

156. To the extent Paragraph 156 refers to documents, those documents speak for themselves, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 156 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 156, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

157. Paragraph 157 refers to documents that speak for themselves, and Walmart denies any characterizations thereof. Paragraph 157 also states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 157. Further, to the extent Paragraph 157 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

158. Paragraph 158 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 158; such allegations are therefore deemed to be denied.

159. To the extent Paragraph 159 refers to documents, those documents speak for themselves, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 159 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 159, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

160. Paragraph 160 refers to documents that speak for themselves, and Walmart denies any characterizations thereof. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 160; such allegations are therefore deemed to be denied.

161. Paragraph 161 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 161 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 161, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

162. Paragraph 162 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 162 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form

a belief as to the truth of the allegations in Paragraph 162, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

163. Paragraph 163 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 163 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 163, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

164. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 164, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

165. Walmart denies the allegations in Paragraph 165 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 165, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

166. Paragraph 166 refers to documents that speak for themselves, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 166 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 166, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

167. Paragraph 167 purports to recite law that speaks for itself, and Walmart denies any characterizations thereof. Paragraph 167 also states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 167. To the extent Paragraph 167 refers to documents, those documents speak for

themselves, and Walmart denies any characterizations thereof. Further, to the extent Paragraph 167 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 167, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

168. Paragraph 168 refers to a document and purports to recite law that speak for themselves, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 168 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 168, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

169. Paragraph 169 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 169; such allegations are therefore deemed to be denied.

170. Paragraph 170 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 170; such allegations are therefore deemed to be denied.

171. The allegations in Paragraph 171 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 171 is deemed to contain allegations against Walmart, Walmart denies such allegations.

172. Paragraph 172 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, Paragraph 172 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 172 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 172, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

173. Paragraph 173 refers to documents that speaks for themselves, and Walmart denies any characterizations thereof. Paragraph 173 also states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 173 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 173, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

174. Paragraph 174 refers to documents that speak for themselves, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 174 to the extent they apply to Walmart, including that Walmart is or was a member of HDA and/or its predecessor HDMA. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 174, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.



175. Paragraph 175 refers to documents that speak for themselves, and Walmart denies any characterizations thereof. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 175; such allegations are therefore deemed to be denied.

176. Paragraph 176 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 176 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 176, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

177. Paragraph 177 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 177 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 177, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

178. Walmart admits that at times relevant to this litigation, it possessed certain data on prescription medication it distributed and dispensed, including both controlled and non-controlled substances. Further, Paragraph 178 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 178 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth

of the allegations in Paragraph 178, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

179. Paragraph 179 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 179; such allegations are therefore deemed to be denied.

180. Paragraph 180 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 180 and further denies the allegations contained therein to the extent they apply to Walmart. Answering further, Paragraph 180 purports to recite law that speaks for itself, and Walmart denies any characterizations thereof. Answering further, to the extent Paragraph 180 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 180, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

181. Paragraph 181 purports to recite law that speaks for itself, and Walmart denies any characterizations thereof. Paragraph 181 also states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 181. Further, to the extent Paragraph 181 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

182. Paragraph 182 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 182 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is

otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 182, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

183. Paragraph 183 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 183, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

184. Paragraph 184 refers to documents that speak for themselves, and Walmart denies any characterizations thereof. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 184; such allegations are therefore deemed to be denied.

185. Walmart admits that at times relevant to this litigation, it possessed certain data on prescription medication it distributed and dispensed, including both controlled and non-controlled substances. Walmart denies the remaining allegations in Paragraph 185 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 185, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

186. Paragraph 186 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 186 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 186, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

187. The allegations in Paragraph 187 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 187 is deemed to contain allegations against Walmart, Walmart denies such allegations.

188. The allegations in Paragraph 188 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 188 is deemed to contain allegations against Walmart, Walmart denies such allegations.

189. The allegations in Paragraph 189 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 189 is deemed to contain allegations against Walmart, Walmart denies such allegations.

190. The allegations in Paragraph 190 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 190 is deemed to contain allegations against Walmart, Walmart denies such allegations.

191. The allegations in Paragraph 191 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 191 is deemed to contain allegations against Walmart, Walmart denies such allegations.

192. The allegations in Paragraph 192 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 192 is deemed to contain allegations against Walmart, Walmart denies such allegations.

193. The allegations in Paragraph 193 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 193 is deemed to contain allegations against Walmart, Walmart denies such allegations.

194. The allegations in Paragraph 194 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 194 is deemed to contain allegations against Walmart, Walmart denies such allegations.

195. The allegations in Paragraph 195 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 195 is deemed to contain allegations against Walmart, Walmart denies such allegations.

196. The allegations in Paragraph 196 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 196 is deemed to contain allegations against Walmart, Walmart denies such allegations.

197. The allegations in Paragraph 197 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 197 is deemed to contain allegations against Walmart, Walmart denies such allegations.

198. The allegations in Paragraph 198 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 198 is deemed to contain allegations against Walmart, Walmart denies such allegations.

199. The allegations in Paragraph 199 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 199 is deemed to contain allegations against Walmart, Walmart denies such allegations.

200. The allegations in Paragraph 200 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 200 is deemed to contain allegations against Walmart, Walmart denies such allegations.

201. The allegations in Paragraph 201 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 201 is deemed to contain allegations against Walmart, Walmart denies such allegations.

202. The allegations in Paragraph 202 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 202 is deemed to contain allegations against Walmart, Walmart denies such allegations.

203. The allegations in Paragraph 203 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 203 is deemed to contain allegations against Walmart, Walmart denies such allegations.

204. The allegations in Paragraph 204 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 204 is deemed to contain allegations against Walmart, Walmart denies such allegations.

205. The allegations in Paragraph 205 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 205 is deemed to contain allegations against Walmart, Walmart denies such allegations.

206. The allegations in Paragraph 206 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 206 is deemed to contain allegations against Walmart, Walmart denies such allegations.

207. The allegations in Paragraph 207 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 207 is deemed to contain allegations against Walmart, Walmart denies such allegations.

208. The allegations in Paragraph 208 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 208 is deemed to contain allegations against Walmart, Walmart denies such allegations.

209. The allegations in Paragraph 209 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore



deemed to be denied. Moreover, to the extent Paragraph 209 is deemed to contain allegations against Walmart, Walmart denies such allegations.

210. The allegations in Paragraph 210 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 210 is deemed to contain allegations against Walmart, Walmart denies such allegations.

211. The allegations in Paragraph 211 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 211 is deemed to contain allegations against Walmart, Walmart denies such allegations.

212. The allegations in Paragraph 212 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 212 is deemed to contain allegations against Walmart, Walmart denies such allegations.

213. The allegations in Paragraph 213 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 213 is deemed to contain allegations against Walmart, Walmart denies such allegations.

214. The allegations in Paragraph 214 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 214 is deemed to contain allegations against Walmart, Walmart denies such allegations.

215. The allegations in Paragraph 215 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 215 is deemed to contain allegations against Walmart, Walmart denies such allegations.

216. The allegations in Paragraph 216 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 216 is deemed to contain allegations against Walmart, Walmart denies such allegations.

217. The allegations in Paragraph 217 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 217 is deemed to contain allegations against Walmart, Walmart denies such allegations.

218. The allegations in Paragraph 218 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 218 is deemed to contain allegations against Walmart, Walmart denies such allegations.

219. The allegations in Paragraph 219 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 219 is deemed to contain allegations against Walmart, Walmart denies such allegations.

220. The allegations in Paragraph 220 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 220 is deemed to contain allegations against Walmart, Walmart denies such allegations.

221. The allegations in Paragraph 221 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 221 is deemed to contain allegations against Walmart, Walmart denies such allegations.

222. The allegations in Paragraph 222 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 222 is deemed to contain allegations against Walmart, Walmart denies such allegations.

223. The allegations in Paragraph 223 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 223 is deemed to contain allegations against Walmart, Walmart denies such allegations.

224. The allegations in Paragraph 224 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 224 is deemed to contain allegations against Walmart, Walmart denies such allegations.

225. The allegations in Paragraph 225 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 225 is deemed to contain allegations against Walmart, Walmart denies such allegations.

226. The allegations in Paragraph 226 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 226 is deemed to contain allegations against Walmart, Walmart denies such allegations.

227. The allegations in Paragraph 227 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 227 is deemed to contain allegations against Walmart, Walmart denies such allegations.

228. The allegations in Paragraph 228 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 228 is deemed to contain allegations against Walmart, Walmart denies such allegations.

229. The allegations in Paragraph 229 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 229 is deemed to contain allegations against Walmart, Walmart denies such allegations.

230. The allegations in Paragraph 230 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 230 is deemed to contain allegations against Walmart, Walmart denies such allegations.

231. The allegations in Paragraph 231 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 231 is deemed to contain allegations against Walmart, Walmart denies such allegations.

232. The allegations in Paragraph 232 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 232 is deemed to contain allegations against Walmart, Walmart denies such allegations.

233. The allegations in Paragraph 233 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 233 is deemed to contain allegations against Walmart, Walmart denies such allegations.

234. The allegations in Paragraph 234 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 234 is deemed to contain allegations against Walmart, Walmart denies such allegations.

235. The allegations in Paragraph 235 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 235 is deemed to contain allegations against Walmart, Walmart denies such allegations.

236. The allegations in Paragraph 236 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 236 is deemed to contain allegations against Walmart, Walmart denies such allegations.

237. The allegations in Paragraph 237 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 237 is deemed to contain allegations against Walmart, Walmart denies such allegations.

238. The allegations in Paragraph 238 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 238 is deemed to contain allegations against Walmart, Walmart denies such allegations.

239. The allegations in Paragraph 239 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 239 is deemed to contain allegations against Walmart, Walmart denies such allegations.

240. The allegations in Paragraph 240 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 240 is deemed to contain allegations against Walmart, Walmart denies such allegations.

241. The allegations in Paragraph 241 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 241 is deemed to contain allegations against Walmart, Walmart denies such allegations.

242. The allegations in Paragraph 242 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 242 is deemed to contain allegations against Walmart, Walmart denies such allegations.

243. The allegations in Paragraph 243 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 243 is deemed to contain allegations against Walmart, Walmart denies such allegations.

244. The allegations in Paragraph 244 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 244 is deemed to contain allegations against Walmart, Walmart denies such allegations.

245. The allegations in Paragraph 245 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore



deemed to be denied. Moreover, to the extent Paragraph 245 is deemed to contain allegations against Walmart, Walmart denies such allegations.

246. The allegations in Paragraph 246 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 246 is deemed to contain allegations against Walmart, Walmart denies such allegations.

247. The allegations in Paragraph 247 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 247 is deemed to contain allegations against Walmart, Walmart denies such allegations.

248. The allegations in Paragraph 248 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 248 is deemed to contain allegations against Walmart, Walmart denies such allegations.

249. The allegations in Paragraph 249 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 249 is deemed to contain allegations against Walmart, Walmart denies such allegations.

250. The allegations in Paragraph 250 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 250 is deemed to contain allegations against Walmart, Walmart denies such allegations.

251. The allegations in Paragraph 251 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 251 is deemed to contain allegations against Walmart, Walmart denies such allegations.

252. The allegations in Paragraph 252 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 252 is deemed to contain allegations against Walmart, Walmart denies such allegations.

253. The allegations in Paragraph 253 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 253 is deemed to contain allegations against Walmart, Walmart denies such allegations.

254. The allegations in Paragraph 254 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 254 is deemed to contain allegations against Walmart, Walmart denies such allegations.

255. The allegations in Paragraph 255 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 255 is deemed to contain allegations against Walmart, Walmart denies such allegations.

256. The allegations in Paragraph 256 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 256 is deemed to contain allegations against Walmart, Walmart denies such allegations.

257. The allegations in Paragraph 257 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 257 is deemed to contain allegations against Walmart, Walmart denies such allegations.

258. The allegations in Paragraph 258 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 258 is deemed to contain allegations against Walmart, Walmart denies such allegations.

259. The allegations in Paragraph 259 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 259 is deemed to contain allegations against Walmart, Walmart denies such allegations.

260. The allegations in Paragraph 260 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 260 is deemed to contain allegations against Walmart, Walmart denies such allegations.

261. The allegations in Paragraph 261 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 261 is deemed to contain allegations against Walmart, Walmart denies such allegations.

262. The allegations in Paragraph 262 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 262 is deemed to contain allegations against Walmart, Walmart denies such allegations.

263. The allegations in Paragraph 263 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 263 is deemed to contain allegations against Walmart, Walmart denies such allegations.

264. The allegations in Paragraph 264 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 264 is deemed to contain allegations against Walmart, Walmart denies such allegations.

265. The allegations in Paragraph 265 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 265 is deemed to contain allegations against Walmart, Walmart denies such allegations.

266. The allegations in Paragraph 266 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 266 is deemed to contain allegations against Walmart, Walmart denies such allegations.

267. The allegations in Paragraph 267 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 267 is deemed to contain allegations against Walmart, Walmart denies such allegations.

268. The allegations in Paragraph 268 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 268 is deemed to contain allegations against Walmart, Walmart denies such allegations.

269. The allegations in Paragraph 269 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 269 is deemed to contain allegations against Walmart, Walmart denies such allegations.

270. The allegations in Paragraph 270 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 270 is deemed to contain allegations against Walmart, Walmart denies such allegations.

271. The allegations in Paragraph 271 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 271 is deemed to contain allegations against Walmart, Walmart denies such allegations.

272. The allegations in Paragraph 272 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 272 is deemed to contain allegations against Walmart, Walmart denies such allegations.

273. The allegations in Paragraph 273 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 273 is deemed to contain allegations against Walmart, Walmart denies such allegations.

274. The allegations in Paragraph 274 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 274 is deemed to contain allegations against Walmart, Walmart denies such allegations.

275. The allegations in Paragraph 275 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 275 is deemed to contain allegations against Walmart, Walmart denies such allegations.

276. The allegations in Paragraph 276 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 276 is deemed to contain allegations against Walmart, Walmart denies such allegations.

277. The allegations in Paragraph 277 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 277 is deemed to contain allegations against Walmart, Walmart denies such allegations.

278. The allegations in Paragraph 278 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 278 is deemed to contain allegations against Walmart, Walmart denies such allegations.

279. The allegations in Paragraph 279 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 279 is deemed to contain allegations against Walmart, Walmart denies such allegations.

280. The allegations in Paragraph 280 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 280 is deemed to contain allegations against Walmart, Walmart denies such allegations.

281. The allegations in Paragraph 281 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore



deemed to be denied. Moreover, to the extent Paragraph 281 is deemed to contain allegations against Walmart, Walmart denies such allegations.

282. The allegations in Paragraph 282 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 282 is deemed to contain allegations against Walmart, Walmart denies such allegations.

283. The allegations in Paragraph 283 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 283 is deemed to contain allegations against Walmart, Walmart denies such allegations.

284. The allegations in Paragraph 284 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 284 is deemed to contain allegations against Walmart, Walmart denies such allegations.

285. The allegations in Paragraph 285 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 285 is deemed to contain allegations against Walmart, Walmart denies such allegations.

286. The allegations in Paragraph 286 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 286 is deemed to contain allegations against Walmart, Walmart denies such allegations.

287. The allegations in Paragraph 287 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 287 is deemed to contain allegations against Walmart, Walmart denies such allegations.

288. The allegations in Paragraph 288 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 288 is deemed to contain allegations against Walmart, Walmart denies such allegations.

289. The allegations in Paragraph 289 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 289 is deemed to contain allegations against Walmart, Walmart denies such allegations.

290. The allegations in Paragraph 290 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 290 is deemed to contain allegations against Walmart, Walmart denies such allegations.

291. The allegations in Paragraph 291 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 291 is deemed to contain allegations against Walmart, Walmart denies such allegations.

292. The allegations in Paragraph 292 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 292 is deemed to contain allegations against Walmart, Walmart denies such allegations.

293. The allegations in Paragraph 293 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 293 is deemed to contain allegations against Walmart, Walmart denies such allegations.

294. The allegations in Paragraph 294 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 294 is deemed to contain allegations against Walmart, Walmart denies such allegations.

295. The allegations in Paragraph 295 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 295 is deemed to contain allegations against Walmart, Walmart denies such allegations.

296. The allegations in Paragraph 296 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 296 is deemed to contain allegations against Walmart, Walmart denies such allegations.

297. The allegations in Paragraph 297 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 297 is deemed to contain allegations against Walmart, Walmart denies such allegations.

298. The allegations in Paragraph 298 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 298 is deemed to contain allegations against Walmart, Walmart denies such allegations.

299. The allegations in Paragraph 299 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 299 is deemed to contain allegations against Walmart, Walmart denies such allegations.

300. The allegations in Paragraph 300 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 300 is deemed to contain allegations against Walmart, Walmart denies such allegations.

301. The allegations in Paragraph 301 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 301 is deemed to contain allegations against Walmart, Walmart denies such allegations.

302. The allegations in Paragraph 302 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 302 is deemed to contain allegations against Walmart, Walmart denies such allegations.

303. The allegations in Paragraph 303 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 303 is deemed to contain allegations against Walmart, Walmart denies such allegations.

304. The allegations in Paragraph 304 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 304 is deemed to contain allegations against Walmart, Walmart denies such allegations.

305. The allegations in Paragraph 305 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 305 is deemed to contain allegations against Walmart, Walmart denies such allegations.

306. The allegations in Paragraph 306 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 306 is deemed to contain allegations against Walmart, Walmart denies such allegations.

307. The allegations in Paragraph 307 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 307 is deemed to contain allegations against Walmart, Walmart denies such allegations.

308. The allegations in Paragraph 308 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 308 is deemed to contain allegations against Walmart, Walmart denies such allegations.

309. The allegations in Paragraph 309 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 309 is deemed to contain allegations against Walmart, Walmart denies such allegations.

310. The allegations in Paragraph 310 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 310 is deemed to contain allegations against Walmart, Walmart denies such allegations.

311. The allegations in Paragraph 311 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 311 is deemed to contain allegations against Walmart, Walmart denies such allegations.

312. The allegations in Paragraph 312 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 312 is deemed to contain allegations against Walmart, Walmart denies such allegations.

313. The allegations in Paragraph 313 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 313 is deemed to contain allegations against Walmart, Walmart denies such allegations.

314. The allegations in Paragraph 314 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 314 is deemed to contain allegations against Walmart, Walmart denies such allegations.

315. The allegations in Paragraph 315 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 315 is deemed to contain allegations against Walmart, Walmart denies such allegations.

316. The allegations in Paragraph 316 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 316 is deemed to contain allegations against Walmart, Walmart denies such allegations.

317. The allegations in Paragraph 317 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore



deemed to be denied. Moreover, to the extent Paragraph 317 is deemed to contain allegations against Walmart, Walmart denies such allegations.

318. The allegations in Paragraph 318 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 318 is deemed to contain allegations against Walmart, Walmart denies such allegations.

319. The allegations in Paragraph 319 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 319 is deemed to contain allegations against Walmart, Walmart denies such allegations.

320. The allegations in Paragraph 320 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 320 is deemed to contain allegations against Walmart, Walmart denies such allegations.

321. The allegations in Paragraph 321 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 321 is deemed to contain allegations against Walmart, Walmart denies such allegations.

322. The allegations in Paragraph 322 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 322 is deemed to contain allegations against Walmart, Walmart denies such allegations.

323. The allegations in Paragraph 323 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 323 is deemed to contain allegations against Walmart, Walmart denies such allegations.

324. The allegations in Paragraph 324 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 324 is deemed to contain allegations against Walmart, Walmart denies such allegations.

325. The allegations in Paragraph 325 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 325 is deemed to contain allegations against Walmart, Walmart denies such allegations.

326. The allegations in Paragraph 326 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 326 is deemed to contain allegations against Walmart, Walmart denies such allegations.

327. The allegations in Paragraph 327 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 327 is deemed to contain allegations against Walmart, Walmart denies such allegations.

328. The allegations in Paragraph 328 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 328 is deemed to contain allegations against Walmart, Walmart denies such allegations.

329. The allegations in Paragraph 329 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 329 is deemed to contain allegations against Walmart, Walmart denies such allegations.

330. The allegations in Paragraph 330 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 330 is deemed to contain allegations against Walmart, Walmart denies such allegations.

331. The allegations in Paragraph 331 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 331 is deemed to contain allegations against Walmart, Walmart denies such allegations.

332. The allegations in Paragraph 332 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 332 is deemed to contain allegations against Walmart, Walmart denies such allegations.

333. The allegations in Paragraph 333 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 333 is deemed to contain allegations against Walmart, Walmart denies such allegations.

334. The allegations in Paragraph 334 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 334 is deemed to contain allegations against Walmart, Walmart denies such allegations.

335. The allegations in Paragraph 335 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 335 is deemed to contain allegations against Walmart, Walmart denies such allegations.

336. The allegations in Paragraph 336 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 336 is deemed to contain allegations against Walmart, Walmart denies such allegations.

337. The allegations in Paragraph 337 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 337 is deemed to contain allegations against Walmart, Walmart denies such allegations.

338. The allegations in Paragraph 338 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 338 is deemed to contain allegations against Walmart, Walmart denies such allegations.

339. The allegations in Paragraph 339 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 339 is deemed to contain allegations against Walmart, Walmart denies such allegations.

340. The allegations in Paragraph 340 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 340 is deemed to contain allegations against Walmart, Walmart denies such allegations.

341. The allegations in Paragraph 341 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 341 is deemed to contain allegations against Walmart, Walmart denies such allegations.

342. The allegations in Paragraph 342 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 342 is deemed to contain allegations against Walmart, Walmart denies such allegations.

343. The allegations in Paragraph 343 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 343 is deemed to contain allegations against Walmart, Walmart denies such allegations.

344. The allegations in Paragraph 344 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 344 is deemed to contain allegations against Walmart, Walmart denies such allegations.

345. The allegations in Paragraph 345 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 345 is deemed to contain allegations against Walmart, Walmart denies such allegations.

346. The allegations in Paragraph 346 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 346 is deemed to contain allegations against Walmart, Walmart denies such allegations.

347. The allegations in Paragraph 347 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 347 is deemed to contain allegations against Walmart, Walmart denies such allegations.

348. The allegations in Paragraph 348 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 348 is deemed to contain allegations against Walmart, Walmart denies such allegations.

349. The allegations in Paragraph 349 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 349 is deemed to contain allegations against Walmart, Walmart denies such allegations.

350. The allegations in Paragraph 350 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 350 is deemed to contain allegations against Walmart, Walmart denies such allegations.

351. The allegations in Paragraph 351 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 351 is deemed to contain allegations against Walmart, Walmart denies such allegations.

352. The allegations in Paragraph 352 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 352 is deemed to contain allegations against Walmart, Walmart denies such allegations.

353. The allegations in Paragraph 353 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore



deemed to be denied. Moreover, to the extent Paragraph 353 is deemed to contain allegations against Walmart, Walmart denies such allegations.

354. The allegations in Paragraph 354 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 354 is deemed to contain allegations against Walmart, Walmart denies such allegations.

355. The allegations in Paragraph 355 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 355 is deemed to contain allegations against Walmart, Walmart denies such allegations.

356. The allegations in Paragraph 356 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 356 is deemed to contain allegations against Walmart, Walmart denies such allegations.

357. The allegations in Paragraph 357 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 357 is deemed to contain allegations against Walmart, Walmart denies such allegations.

358. The allegations in Paragraph 358 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 358 is deemed to contain allegations against Walmart, Walmart denies such allegations.

359. The allegations in Paragraph 359 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 359 is deemed to contain allegations against Walmart, Walmart denies such allegations.

360. The allegations in Paragraph 360 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 360 is deemed to contain allegations against Walmart, Walmart denies such allegations.

361. The allegations in Paragraph 361 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 361 is deemed to contain allegations against Walmart, Walmart denies such allegations.

362. The allegations in Paragraph 362 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 362 is deemed to contain allegations against Walmart, Walmart denies such allegations.

363. The allegations in Paragraph 363 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 363 is deemed to contain allegations against Walmart, Walmart denies such allegations.

364. The allegations in Paragraph 364 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 364 is deemed to contain allegations against Walmart, Walmart denies such allegations.

365. The allegations in Paragraph 365 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 365 is deemed to contain allegations against Walmart, Walmart denies such allegations.

366. The allegations in Paragraph 366 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 366 is deemed to contain allegations against Walmart, Walmart denies such allegations.

367. The allegations in Paragraph 367 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 367 is deemed to contain allegations against Walmart, Walmart denies such allegations.

368. The allegations in Paragraph 368 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 368 is deemed to contain allegations against Walmart, Walmart denies such allegations.

369. The allegations in Paragraph 369 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 369 is deemed to contain allegations against Walmart, Walmart denies such allegations.

370. The allegations in Paragraph 370 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 370 is deemed to contain allegations against Walmart, Walmart denies such allegations.

371. The allegations in Paragraph 371 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 371 is deemed to contain allegations against Walmart, Walmart denies such allegations.

372. The allegations in Paragraph 372 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 372 is deemed to contain allegations against Walmart, Walmart denies such allegations.

373. The allegations in Paragraph 373 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 373 is deemed to contain allegations against Walmart, Walmart denies such allegations.

374. The allegations in Paragraph 374 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 374 is deemed to contain allegations against Walmart, Walmart denies such allegations.

375. The allegations in Paragraph 375 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 375 is deemed to contain allegations against Walmart, Walmart denies such allegations.

376. The allegations in Paragraph 376 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 376 is deemed to contain allegations against Walmart, Walmart denies such allegations.

377. The allegations in Paragraph 377 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 377 is deemed to contain allegations against Walmart, Walmart denies such allegations.

378. The allegations in Paragraph 378 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 378 is deemed to contain allegations against Walmart, Walmart denies such allegations.

379. The allegations in Paragraph 379 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 379 is deemed to contain allegations against Walmart, Walmart denies such allegations.

380. The allegations in Paragraph 380 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 380 is deemed to contain allegations against Walmart, Walmart denies such allegations.

381. The allegations in Paragraph 381 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 381 is deemed to contain allegations against Walmart, Walmart denies such allegations.

382. The allegations in Paragraph 382 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 382 is deemed to contain allegations against Walmart, Walmart denies such allegations.

383. The allegations in Paragraph 383 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 383 is deemed to contain allegations against Walmart, Walmart denies such allegations.

384. The allegations in Paragraph 384 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 384 is deemed to contain allegations against Walmart, Walmart denies such allegations.

385. The allegations in Paragraph 385 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 385 is deemed to contain allegations against Walmart, Walmart denies such allegations.

386. The allegations in Paragraph 386 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 386 is deemed to contain allegations against Walmart, Walmart denies such allegations.

387. The allegations in Paragraph 387 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 387 is deemed to contain allegations against Walmart, Walmart denies such allegations.

388. Walmart admits that for a time period prior to May 2018, Walmart, through its subsidiary, distributed certain prescription controlled substances listed in Schedule II to certain retail pharmacies operated by Walmart and/or its subsidiaries in the United States. Walmart further admits that for a time period prior to July 2018, Walmart, through its subsidiary, distributed certain prescription controlled substances listed in Schedules III through V to certain retail pharmacies operated by Walmart and/or its subsidiaries in the United States. Walmart also admits that it dispensed certain prescription controlled substances to customers of certain retail pharmacies



operated by Walmart and/or its subsidiaries in the United States with valid prescriptions. Walmart denies the remaining allegations in Paragraph 388.

389. Walmart admits that, upon information and belief, Walmart, through its subsidiaries, is the largest private employer in the United States, employing more than 1.5 million people. Walmart denies the remaining allegations in Paragraph 389.

390. Walmart admits that for a time period prior to May 2018, Walmart, through its subsidiary, distributed certain prescription controlled substances listed in Schedule II to certain retail pharmacies operated by Walmart and/or its subsidiaries in the United States. Walmart further admits that for a time period prior to July 2018, Walmart, through its subsidiary, distributed certain prescription controlled substances listed in Schedules III through V to certain retail pharmacies operated by Walmart and/or its subsidiaries in the United States.

391. Walmart denies the allegations in Paragraph 391.

392. Walmart admits that employees at Walmart's pharmacy distribution centers monitored orders and alerted managers of potential issues, who would follow up on orders by speaking with pharmacists, and escalate issues to market and/or region leadership or other Walmart employees as needed to investigate orders and/or resolve concerns. Walmart denies the remaining allegations in Paragraph 392.

393. Walmart denies the allegations in Paragraph 393.

394. Walmart admits that, from 2011 until approximately 2015, Walmart implemented order alerts in Reddwerks (Walmart's order fulfillment system) that flagged orders for controlled substances of 50 bottles or more and orders for amounts 30% higher than a rolling 4-week average for that item. Walmart also admits that, from approximately July 2012 until approximately 2015, Walmart also implemented a hard limit of 20 bottles for shipments of Oxycodone 30 mg and

internally circulated a report listing orders for Schedule II controlled substances of more than 20 bottles for further review and follow-up as needed. Walmart denies the remaining allegations in Paragraph 394.

395. Walmart denies the allegations in Paragraph 395 and further denies that Plaintiff has accurately stated Walmart's obligations under the law.

396. Walmart admits that in mid-2012 Walmart implemented a hard limit of 20 bottles for orders of Oxycodone 30 mg in addition to its other order monitoring processes, policies and procedures. Walmart denies the remaining allegations in Paragraph 396 and further denies that Plaintiff has accurately stated Walmart's obligations under the law.

397. Walmart admits that in mid-2012, Walmart also monitored weekly orders for Schedule II controlled substances of more than 20 bottles. Walmart further admits that Walmart internally circulated a report listing orders for Schedule II controlled substances of more than 20 bottles for further review and follow-up as needed. Walmart denies the remaining allegations in Paragraph 397.

398. Walmart denies the allegations in this Paragraph and affirmatively states that Walmart and Sam's Club pharmacies were required to place all orders for Schedule II controlled substances through Walmart's Schedule II controlled substance distribution center. Walmart further affirmatively states that if Walmart's Schedule II controlled substances distribution center did not carry the ordered item or it was out of stock, the order placed with Walmart's controlled substances distribution center could be routed by Walmart's controlled substances distribution center to be fulfilled by a third-party distributor. Walmart admits that during certain periods of time the third-party distributor described above was (i) McKesson for Walmart pharmacies and

(ii) AmerisourceBergen or McKesson for Sam's Club pharmacies located in Georgia. Walmart denies the remaining allegations in Paragraph 398.

399. Paragraph 399 refers to documents that speak for themselves, and Walmart denies any characterizations thereof. Paragraph 399 also states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 399 and further denies the allegations contained therein.

400. Walmart admits that, in 2015, Walmart implemented store-item specific thresholds as part of its order monitoring system. These store-item specific thresholds were generally calculated based on the store's weekly average for that item plus three standard deviations based on 52 weeks of shipment data for that store. Walmart admits that these store-specific thresholds included certain minimum and maximum thresholds. Walmart denies the remaining allegations in Paragraph 400.

401. Walmart denies the allegations in Paragraph 401.

402. Paragraph 402 purports to compile governmentally-disclosed ARCOS data which speaks for itself, and Walmart denies any characterization thereof. Further, Paragraph 402 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 402 and further denies the allegations contained therein.

403. Paragraph 403 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 403 and further denies the allegations contained therein.

404. Walmart admits that for a time period prior to May 2018, Walmart, through its subsidiary, distributed certain prescription opioid medication to certain retail pharmacies operated

by Walmart and/or its subsidiaries in states other than Georgia. Walmart also admits that it dispensed certain prescription opioid medication to customers of certain retail pharmacies operated by Walmart and/or its subsidiaries in states other than Georgia with valid prescriptions. Walmart denies the remaining allegations in Paragraph 404.

405. Paragraph 405 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 405 and further denies the allegations contained therein.

406. Paragraph 406 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 406 and further denies the allegations contained therein.

407. Paragraph 407 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 407 and further denies the allegations contained therein.

408. Paragraph 408 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 408 and further denies the allegations contained therein.

409. Paragraph 409 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 409 and further denies the allegations contained therein.

410. Walmart denies the allegations in Paragraph 410.

411. Paragraph 411 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 411 and further denies the allegations contained therein.

412. Paragraph 412 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 412 and further denies the allegations contained therein.

413. Walmart admits that Walmart and/or its subsidiaries operated retail pharmacies at certain locations in the United States. Walmart also admits that Walmart, through its subsidiary, currently has six pharmacy distribution centers that distribute certain non-controlled prescription medication to certain pharmacies operated by Walmart and/or its subsidiaries. Walmart further admits that Walmart and/or its subsidiaries operated a mail-order pharmacy and a specialty pharmacy, but denies that those pharmacies were located in the County. Walmart denies the remaining allegations in Paragraph 413.

414. Paragraph 414 refers to documents that speak for themselves, and Walmart denies any characterizations thereof. Walmart admits that it provided its pharmacists with a variety of resources to aid in their use of their professional judgment, including policies and training that provided guidance on, among other topics, potential prescriber, patient, and prescription red flags. Walmart denies the remaining allegations in Paragraph 414.

415. Walmart admits that during the time period it self-distributed controlled substances, Walmart, through its subsidiary, distributed certain prescription medication to certain pharmacies operated by Walmart and/or subsidiaries thereof. Walmart also admits that under certain circumstances a third-party distributor may have filled orders for certain prescription medications placed by certain Walmart and/or Sam's Club pharmacies. Walmart denies the remaining allegations in Paragraph 415, including that Walmart and/or Sam's Club pharmacies were able to have the same order for prescription medication filled by both Walmart and a third-party distributor.

416. Paragraph 416 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 416 and further denies the allegations contained therein.

417. Paragraph 417 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 417 and further denies the allegations contained therein.

418. Paragraph 418 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 418 and further denies the allegations contained therein.

419. Walmart admits that at times relevant to this litigation, it possessed certain data on prescription opioid medication it distributed to its own pharmacies. Walmart denies the remaining allegations in Paragraph 419.

420. Walmart admits that at times relevant to this litigation, it possessed certain data on prescription opioid medication dispensed by Walmart pharmacists at its own pharmacies. Walmart denies the remaining allegations in Paragraph 420.

421. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 421; such allegations are therefore deemed to be denied.

422. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 422; such allegations are therefore deemed to be denied.

423. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 423; such allegations are therefore deemed to be denied.

424. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 424; such allegations are therefore deemed to be denied.

425. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 425; such allegations are therefore deemed to be denied.

426. Walmart denies the allegations in Paragraph 426.

427. Paragraph 427 refers to documents that speak for themselves, and Walmart denies any characterizations thereof. During all relevant times, Walmart pharmacists were permitted and encouraged to exercise their professional judgment to not fill prescriptions they deemed were not appropriate. Walmart admits that its relevant policies were amended in 2017 to expressly allow the use of “blanket refusal” forms; however, even before 2017, Walmart pharmacists were permitted and encouraged to refuse to fill any prescriptions from a particular prescriber they deemed were not appropriate. Walmart further admits that its policies were amended in 2017 to describe procedures for central blocks of prescribers. Walmart denies the remaining allegations in Paragraph 427.

428. Paragraph 428 refers to documents that speak for themselves, and Walmart denies any characterizations thereof. During all relevant times, Walmart pharmacists were permitted and encouraged to exercise their professional judgment to not fill prescriptions they deemed were not appropriate. Walmart admits that its relevant policies were amended in 2017 to expressly allow

the use of “blanket refusal” forms; however, even before 2017, Walmart pharmacists were permitted and encouraged to refuse to fill any prescriptions from a particular prescriber they deemed were not appropriate. Walmart further admits that its policies were amended in 2017 to describe procedures for central blocks of prescribers. Walmart denies the remaining allegations in Paragraph 428.

429. Walmart admits that prior to 2013, Walmart pharmacists’ bonus compensation was based on multiple considerations, including, among other things, the aggregate of all prescriptions filled by the pharmacist’s store. Walmart also admits that in 2013, Walmart removed controlled substance prescriptions from any prescription count component of bonus compensation for Walmart pharmacists. Walmart denies the remaining allegations in Paragraph 429.

430. Walmart admits that it received a show cause order from DEA on November 13, 2009, relating to a store located in California operated by Walmart and/or one of its subsidiaries. The November 13, 2009 show cause order speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations contained in Paragraph 430.

431. Walmart admits that it entered into a memorandum of agreement with DEA on March 17, 2011. The March 17, 2011 memorandum of agreement speaks for itself and Walmart denies any characterization thereof. Walmart denies the remaining allegations in Paragraph 431.

432. Walmart admits that it entered into a memorandum of agreement with DEA on March 17, 2011. The March 17, 2011 memorandum of agreement speaks for itself and Walmart denies any characterization thereof. Walmart denies the remaining allegations in Paragraph 432.

433. Walmart admits that it entered into a memorandum of agreement with DEA on March 17, 2011. The March 17, 2011 memorandum of agreement speaks for itself and Walmart denies any characterization thereof. Walmart denies the remaining allegations in Paragraph 433.



434. Walmart denies the allegations in Paragraph 434.

435. Paragraph 435 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 435.

436. Paragraph 436 refers to documents that speak for themselves, and Walmart denies any characterizations thereof. Answering further, Walmart admits that the U.S. Department of Justice (“DOJ”) filed a lawsuit against Walmart on or around December 22, 2020 in the District of Delaware styled, *United States of America v. Walmart Inc. et al.*, No. 1:20-cv-01744. Walmart denies the remaining allegations in Paragraph 436.

437. Paragraph 437 refers to documents that speak for themselves, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 437.

438. Paragraph 438 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 438 and further denies the allegations contained therein.

439. Paragraph 439 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 439 and further denies the allegations contained therein.

440. The allegations in Paragraph 440 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 440 is deemed to contain allegations against Walmart, Walmart denies such allegations.

441. The allegations in Paragraph 441 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without

knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 441 is deemed to contain allegations against Walmart, Walmart denies such allegations.

442. The allegations in Paragraph 442 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 442 is deemed to contain allegations against Walmart, Walmart denies such allegations.

443. The allegations in Paragraph 443 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 443 is deemed to contain allegations against Walmart, Walmart denies such allegations.

444. The allegations in Paragraph 444 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 444 is deemed to contain allegations against Walmart, Walmart denies such allegations.

445. The allegations in Paragraph 445 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 445 is deemed to contain allegations against Walmart, Walmart denies such allegations.

446. The allegations in Paragraph 446 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 446 is deemed to contain allegations against Walmart, Walmart denies such allegations.

447. The allegations in Paragraph 447 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 447 is deemed to contain allegations against Walmart, Walmart denies such allegations.

448. The allegations in Paragraph 448 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 448 is deemed to contain allegations against Walmart, Walmart denies such allegations.

449. The allegations in Paragraph 449 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 449 is deemed to contain allegations against Walmart, Walmart denies such allegations.

450. The allegations in Paragraph 450 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 450 is deemed to contain allegations against Walmart, Walmart denies such allegations.

451. The allegations in Paragraph 451 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 451 is deemed to contain allegations against Walmart, Walmart denies such allegations.

452. The allegations in Paragraph 452 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 452 is deemed to contain allegations against Walmart, Walmart denies such allegations.

453. The allegations in Paragraph 453 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 453 is deemed to contain allegations against Walmart, Walmart denies such allegations.

454. The allegations in Paragraph 454 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 454 is deemed to contain allegations against Walmart, Walmart denies such allegations.

455. The allegations in Paragraph 455 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 455 is deemed to contain allegations against Walmart, Walmart denies such allegations.

456. The allegations in Paragraph 456 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 456 is deemed to contain allegations against Walmart, Walmart denies such allegations.

457. The allegations in Paragraph 457 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 457 is deemed to contain allegations against Walmart, Walmart denies such allegations.

458. The allegations in Paragraph 458 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 458 is deemed to contain allegations against Walmart, Walmart denies such allegations.

459. The allegations in Paragraph 459 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 459 is deemed to contain allegations against Walmart, Walmart denies such allegations.

460. The allegations in Paragraph 460 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 460 is deemed to contain allegations against Walmart, Walmart denies such allegations.

461. The allegations in Paragraph 461 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 461 is deemed to contain allegations against Walmart, Walmart denies such allegations.

462. The allegations in Paragraph 462 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 462 is deemed to contain allegations against Walmart, Walmart denies such allegations.

463. The allegations in Paragraph 463 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 463 is deemed to contain allegations against Walmart, Walmart denies such allegations.

464. The allegations in Paragraph 464 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 464 is deemed to contain allegations against Walmart, Walmart denies such allegations.

465. The allegations in Paragraph 465 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 465 is deemed to contain allegations against Walmart, Walmart denies such allegations.

466. The allegations in Paragraph 466 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 466 is deemed to contain allegations against Walmart, Walmart denies such allegations.

467. The allegations in Paragraph 467 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 467 is deemed to contain allegations against Walmart, Walmart denies such allegations.

468. The allegations in Paragraph 468 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 468 is deemed to contain allegations against Walmart, Walmart denies such allegations.

469. The allegations in Paragraph 469 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 469 is deemed to contain allegations against Walmart, Walmart denies such allegations.

470. The allegations in Paragraph 470 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 470 is deemed to contain allegations against Walmart, Walmart denies such allegations.

471. The allegations in Paragraph 471 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 471 is deemed to contain allegations against Walmart, Walmart denies such allegations.

472. The allegations in Paragraph 472 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 472 is deemed to contain allegations against Walmart, Walmart denies such allegations.



473. The allegations in Paragraph 473 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 473 is deemed to contain allegations against Walmart, Walmart denies such allegations.

474. The allegations in Paragraph 474 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 474 is deemed to contain allegations against Walmart, Walmart denies such allegations.

475. The allegations in Paragraph 475 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 475 is deemed to contain allegations against Walmart, Walmart denies such allegations.

476. The allegations in Paragraph 476 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 476 is deemed to contain allegations against Walmart, Walmart denies such allegations.

477. The allegations in Paragraph 477 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 477 is deemed to contain allegations against Walmart, Walmart denies such allegations.

478. The allegations in Paragraph 478 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 478 is deemed to contain allegations against Walmart, Walmart denies such allegations.

479. The allegations in Paragraph 479 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 479 is deemed to contain allegations against Walmart, Walmart denies such allegations.

480. The allegations in Paragraph 480 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 480 is deemed to contain allegations against Walmart, Walmart denies such allegations.

481. The allegations in Paragraph 481 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 481 is deemed to contain allegations against Walmart, Walmart denies such allegations.

482. The allegations in Paragraph 482 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 482 is deemed to contain allegations against Walmart, Walmart denies such allegations.

483. The allegations in Paragraph 483 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 483 is deemed to contain allegations against Walmart, Walmart denies such allegations.

484. The allegations in Paragraph 484 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 484 is deemed to contain allegations against Walmart, Walmart denies such allegations.

485. The allegations in Paragraph 485 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 485 is deemed to contain allegations against Walmart, Walmart denies such allegations.

486. The allegations in Paragraph 486 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 486 is deemed to contain allegations against Walmart, Walmart denies such allegations.

487. The allegations in Paragraph 487 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 487 is deemed to contain allegations against Walmart, Walmart denies such allegations.

488. The allegations in Paragraph 488 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 488 is deemed to contain allegations against Walmart, Walmart denies such allegations.

489. The allegations in Paragraph 489 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 489 is deemed to contain allegations against Walmart, Walmart denies such allegations.

490. The allegations in Paragraph 490 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 490 is deemed to contain allegations against Walmart, Walmart denies such allegations.

491. The allegations in Paragraph 491 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 491 is deemed to contain allegations against Walmart, Walmart denies such allegations.

492. The allegations in Paragraph 492 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 492 is deemed to contain allegations against Walmart, Walmart denies such allegations.

493. The allegations in Paragraph 493 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 493 is deemed to contain allegations against Walmart, Walmart denies such allegations.

494. The allegations in Paragraph 494 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 494 is deemed to contain allegations against Walmart, Walmart denies such allegations.

495. The allegations in Paragraph 495 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 495 is deemed to contain allegations against Walmart, Walmart denies such allegations.

496. The allegations in Paragraph 496 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 496 is deemed to contain allegations against Walmart, Walmart denies such allegations.

497. The allegations in Paragraph 497 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 497 is deemed to contain allegations against Walmart, Walmart denies such allegations.

498. The allegations in Paragraph 498 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 498 is deemed to contain allegations against Walmart, Walmart denies such allegations.

499. The allegations in Paragraph 499 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 499 is deemed to contain allegations against Walmart, Walmart denies such allegations.

500. The allegations in Paragraph 500 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 500 is deemed to contain allegations against Walmart, Walmart denies such allegations.

501. The allegations in Paragraph 501 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 501 is deemed to contain allegations against Walmart, Walmart denies such allegations.

502. The allegations in Paragraph 502 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 502 is deemed to contain allegations against Walmart, Walmart denies such allegations.

503. Walmart denies the allegations in Paragraph 503 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 503, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

504. Paragraph 504 refers to a document and recites law that speak for themselves, and Walmart denies any characterizations thereof. Paragraph 504 also states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 504 and further denies the remaining allegations contained therein to the extent

they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 504, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

505. Paragraph 505 refers to a document and recites law that speak for themselves, and Walmart denies any characterizations thereof. Paragraph 505 also states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 505 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 505, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

506. The allegations in Paragraph 506 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 506 is deemed to contain allegations against Walmart, Walmart denies such allegations.

507. The allegations in Paragraph 507 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 507 is deemed to contain allegations against Walmart, Walmart denies such allegations.

508. The allegations in Paragraph 508 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore



deemed to be denied. Moreover, to the extent Paragraph 508 is deemed to contain allegations against Walmart, Walmart denies such allegations.

509. The allegations in Paragraph 509 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 509 is deemed to contain allegations against Walmart, Walmart denies such allegations.

510. Paragraph 510 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 510 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 510, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

511. Paragraph 511 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 511 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 511, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

512. The allegations in Paragraph 512 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 512 is deemed to contain allegations against Walmart, Walmart denies such allegations.

513. The allegations in Paragraph 513 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 513 is deemed to contain allegations against Walmart, Walmart denies such allegations.

514. The allegations in Paragraph 514 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 514 is deemed to contain allegations against Walmart, Walmart denies such allegations.

515. The allegations in Paragraph 515 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 515 is deemed to contain allegations against Walmart, Walmart denies such allegations.

516. The allegations in Paragraph 516 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 516 is deemed to contain allegations against Walmart, Walmart denies such allegations.

517. The allegations in Paragraph 517 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 517 is deemed to contain allegations against Walmart, Walmart denies such allegations.

518. The allegations in Paragraph 518 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 518 is deemed to contain allegations against Walmart, Walmart denies such allegations.

519. The allegations in Paragraph 519 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 519 is deemed to contain allegations against Walmart, Walmart denies such allegations.

520. The allegations in Paragraph 520 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 520 is deemed to contain allegations against Walmart, Walmart denies such allegations.

521. The allegations in Paragraph 521 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 521 is deemed to contain allegations against Walmart, Walmart denies such allegations.

522. The allegations in Paragraph 522 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 522 is deemed to contain allegations against Walmart, Walmart denies such allegations.

523. The allegations in Paragraph 523 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 523 is deemed to contain allegations against Walmart, Walmart denies such allegations.

524. The allegations in Paragraph 524 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 524 is deemed to contain allegations against Walmart, Walmart denies such allegations.

525. The allegations in Paragraph 525 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 525 is deemed to contain allegations against Walmart, Walmart denies such allegations.

526. The allegations in Paragraph 526 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 526 is deemed to contain allegations against Walmart, Walmart denies such allegations.

527. The allegations in Paragraph 527 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 527 is deemed to contain allegations against Walmart, Walmart denies such allegations.

528. The allegations in Paragraph 528 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 528 is deemed to contain allegations against Walmart, Walmart denies such allegations.

529. The allegations in Paragraph 529 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 529 is deemed to contain allegations against Walmart, Walmart denies such allegations.

530. Paragraph 530 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 530 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 530, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

531. Paragraph 531 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 531 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 531, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

532. Paragraph 532 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. To the extent Paragraph 532 purports to contain factual allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 532, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

533. Paragraph 533 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 533 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 533, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

534. Paragraph 534 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. To the extent Paragraph 534 purports to contain factual allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 534, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

535. Paragraph 535 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 535; such allegations are therefore deemed to be denied.

536. Paragraph 536 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. To the extent Paragraph 536 purports to contain factual allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 536, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

537. Paragraph 537 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 537 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 537, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

538. During all relevant times, Walmart pharmacists were permitted and encouraged to exercise their professional judgment to not fill prescriptions they deemed were not appropriate. Walmart admits that its relevant policies were amended in 2017 to expressly allow the use of “blanket refusal” forms; however, even before 2017, Walmart pharmacists were permitted and encouraged to refuse to fill any prescriptions from a particular prescriber they deemed were not appropriate. Walmart further admits that its policies were amended in 2017 to describe procedures for central blocks of prescribers. Walmart denies the remaining allegations in Paragraph 538.

539. Paragraph 539 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. To the extent Paragraph 539 is deemed to contain allegations against Walmart, including any allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 539; such allegations are therefore deemed to be denied.

540. Paragraph 540 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. To the extent Paragraph 540 is deemed to contain allegations against Walmart, including any allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 540; such allegations are therefore deemed to be denied.

541. Paragraph 541 refers to documents that speak for themselves, and Walmart denies any characterizations thereof. To the extent Paragraph 541 is deemed to contain allegations against Walmart, including any allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 541, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

542. Paragraph 542 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Answering further, the allegations in Paragraph 542 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth;



such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 542 is deemed to contain allegations against Walmart, Walmart denies such allegations.

543. Paragraph 543 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Answering further, the allegations in Paragraph 543 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 543 is deemed to contain allegations against Walmart, Walmart denies such allegations.

544. Paragraph 544 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 544 to the extent they apply to Walmart, including that Walmart is or was a member of HDA and/or its predecessors HDMA and NWDA. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 544, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

545. Paragraph 545 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 545 to the extent they apply to Walmart, including that Walmart is or was a member of HDA and/or its predecessors HDMA and NWDA. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 545, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

546. Paragraph 546 refers to documents that speak for themselves, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 546 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient

to form a belief as to the truth of the allegations in Paragraph 546, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

547. Walmart denies the allegations in Paragraph 547 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 547, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

548. Paragraph 548 refers to documents that speak for themselves, and Walmart denies any characterizations thereof. Walmart admits that NACDS provided support for S. 483, including signing a letter supporting the bill that was sent to Senators Hatch and White. Walmart denies the remaining allegations in Paragraph 548 to the extent they apply to Walmart, including that Walmart is or was a member of HDA and/or its predecessors HDMA and NWDA. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 548, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

549. Paragraph 549 refers to a document and purports to recite law that speak for themselves, and Walmart denies any characterizations thereof. Paragraph 549 also states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 549. Further, the allegations in Paragraph 549 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 549 is deemed to contain allegations against Walmart, including any allegations of wrongdoing, Walmart denies such allegations.

550. The allegations in Paragraph 550 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 550 is deemed to contain allegations against Walmart, Walmart denies such allegations.

551. The allegations in Paragraph 551 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 551 is deemed to contain allegations against Walmart, Walmart denies such allegations.

552. Paragraph 552 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 552 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 552, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

553. Paragraph 553 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 553; such allegations are therefore deemed to be denied.

554. Paragraph 554 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 554; such allegations are therefore deemed to be denied.

555. Paragraph 555 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart admits that the NACDS Policy Council has discussed certain legislation relating to regulatory requirements applicable to pharmacists. Walmart denies the remaining allegations in Paragraph 555 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 555, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

556. Paragraph 556 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 556 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 556, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

557. Paragraph 557 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 557 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 557, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

558. Paragraph 558 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 558 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 558, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

559. Walmart denies the allegations in Paragraph 559 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 559, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

560. The allegations in Paragraph 560 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 560 is deemed to contain allegations against Walmart, Walmart denies such allegations.

561. The allegations in Paragraph 561 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 561 is deemed to contain allegations against Walmart, Walmart denies such allegations.

562. The allegations in Paragraph 562 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 562 is deemed to contain allegations against Walmart, Walmart denies such allegations.

563. Paragraph 563 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart admits that McKesson and Walmart formed ClarusOne Sourcing Service LLP in May 2016 to source generic pharmaceuticals to members of the

organization, including Walmart and McKesson. Walmart denies the remaining allegations in Paragraph 563.

564. Walmart denies the allegations in Paragraph 564 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 564, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

565. Walmart denies the allegations in Paragraph 565 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 565, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

566. Paragraph 566 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 566 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 566, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

567. Walmart denies the allegations in Paragraph 567 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 567, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

568. Walmart denies the allegations in Paragraph 568 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 568, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

569. Walmart denies the allegations in Paragraph 569 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 569, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

570. The allegations in Paragraph 570 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 570 is deemed to contain allegations against Walmart, Walmart denies such allegations.

571. The allegations in Paragraph 571 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 571 is deemed to contain allegations against Walmart, Walmart denies such allegations.

572. The allegations in Paragraph 572 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 572 is deemed to contain allegations against Walmart, Walmart denies such allegations.

573. The allegations in Paragraph 573 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 573 is deemed to contain allegations against Walmart, Walmart denies such allegations.

574. The allegations in Paragraph 574 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 574 is deemed to contain allegations against Walmart, Walmart denies such allegations.

575. The allegations in Paragraph 575 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 575 is deemed to contain allegations against Walmart, Walmart denies such allegations.

576. The allegations in Paragraph 576 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 576 is deemed to contain allegations against Walmart, Walmart denies such allegations.

577. The allegations in Paragraph 577 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 577 is deemed to contain allegations against Walmart, Walmart denies such allegations.



578. The allegations in Paragraph 578 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 578 is deemed to contain allegations against Walmart, Walmart denies such allegations.

579. The allegations in Paragraph 579 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 579 is deemed to contain allegations against Walmart, Walmart denies such allegations.

580. The allegations in Paragraph 580 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 580 is deemed to contain allegations against Walmart, Walmart denies such allegations.

581. The allegations in Paragraph 581 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 581 is deemed to contain allegations against Walmart, Walmart denies such allegations.

582. The allegations in Paragraph 582 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 582 is deemed to contain allegations against Walmart, Walmart denies such allegations.

583. The allegations in Paragraph 583 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 583 is deemed to contain allegations against Walmart, Walmart denies such allegations.

584. The allegations in Paragraph 584 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 584 is deemed to contain allegations against Walmart, Walmart denies such allegations.

585. The allegations in Paragraph 585 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 585 is deemed to contain allegations against Walmart, Walmart denies such allegations.

586. The allegations in Paragraph 586 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 586 is deemed to contain allegations against Walmart, Walmart denies such allegations.

587. The allegations in Paragraph 587 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 587 is deemed to contain allegations against Walmart, Walmart denies such allegations.

588. The allegations in Paragraph 588 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 588 is deemed to contain allegations against Walmart, Walmart denies such allegations.

589. The allegations in Paragraph 589 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 589 is deemed to contain allegations against Walmart, Walmart denies such allegations.

590. The allegations in Paragraph 590 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 590 is deemed to contain allegations against Walmart, Walmart denies such allegations.

591. The allegations in Paragraph 591 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 591 is deemed to contain allegations against Walmart, Walmart denies such allegations.

592. The allegations in Paragraph 592 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 592 is deemed to contain allegations against Walmart, Walmart denies such allegations.

593. The allegations in Paragraph 593 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 593 is deemed to contain allegations against Walmart, Walmart denies such allegations.

594. The allegations in Paragraph 594 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 594 is deemed to contain allegations against Walmart, Walmart denies such allegations.

595. The allegations in Paragraph 595 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 595 is deemed to contain allegations against Walmart, Walmart denies such allegations.

596. The allegations in Paragraph 596 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 596 is deemed to contain allegations against Walmart, Walmart denies such allegations.

597. The allegations in Paragraph 597 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 597 is deemed to contain allegations against Walmart, Walmart denies such allegations.

598. The allegations in Paragraph 598 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 598 is deemed to contain allegations against Walmart, Walmart denies such allegations.

599. Paragraph 599 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 599 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 599, such allegations are therefore deemed to be denied.

600. Walmart denies the allegations in Paragraph 600 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to

the truth of the allegations in Paragraph 600, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

601. Paragraph 601 refers to documents that speak for themselves, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 601 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 601, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

602. Walmart denies the allegations in Paragraph 602 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 602, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

603. Walmart denies the allegations in Paragraph 603 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 603, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

604. Walmart denies the allegations in 604 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 604, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

605. Walmart has expressed its commitment to taking an active role in the fight against our nation's opioid issue. Walmart denies the remaining allegations in Paragraph 605 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form

a belief as to the truth of the allegations in Paragraph 605, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

606. The allegations in Paragraph 606 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 606 is deemed to contain allegations against Walmart, Walmart denies such allegations.

607. The allegations in Paragraph 607 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 607 is deemed to contain allegations against Walmart, Walmart denies such allegations.

608. The allegations in Paragraph 608 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 608 is deemed to contain allegations against Walmart, Walmart denies such allegations.

609. The allegations in Paragraph 609 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 609 is deemed to contain allegations against Walmart, Walmart denies such allegations.

610. The allegations in Paragraph 610 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 610 is deemed to contain allegations against Walmart, Walmart denies such allegations.

611. The allegations in Paragraph 611 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 611 is deemed to contain allegations against Walmart, Walmart denies such allegations.

612. The allegations in Paragraph 612 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 612 is deemed to contain allegations against Walmart, Walmart denies such allegations.

613. The allegations in Paragraph 613 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 613 is deemed to contain allegations against Walmart, Walmart denies such allegations.

614. Paragraph 614 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 614.



615. Paragraph 615 refers to documents that speak for themselves, and Walmart denies any characterizations thereof. Answering further, Walmart admits that the U.S. Department of Justice (“DOJ”) filed a lawsuit against Walmart on or around December 22, 2020 in the District of Delaware styled, *United States of America v. Walmart Inc. et al.*, No. 1:20-cv-01744. Walmart denies the remaining allegations in Paragraph 615 to the extent they apply to Walmart.

616. The allegations in Paragraph 616 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 616 is deemed to contain allegations against Walmart, Walmart denies such allegations.

617. The allegations in Paragraph 617 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 617 is deemed to contain allegations against Walmart, Walmart denies such allegations.

618. Paragraph 618 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in this Paragraph 618 to the extent they apply to Walmart, including that Walmart is or was a member of HDA and/or its predecessors HDMA and NWDA. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 618, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

619. Paragraph 619 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 619 to the extent

they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 619, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

620. Walmart admits that the National Association of Chain Drug Stores filed an amicus curiae brief in support of Defendants' motion to dismiss in *United States of America v. Walmart Inc. et al.*, No. 1:20-cv-01744 (D. Del.).

621. Paragraph 621 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 621 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 621, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

622. Walmart denies the allegations in Paragraph 622 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 622, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

623. The allegations in Paragraph 623 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 623 is deemed to contain allegations against Walmart, Walmart denies such allegations.

624. The allegations in Paragraph 624 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without

knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 624 is deemed to contain allegations against Walmart, Walmart denies such allegations.

625. The allegations in Paragraph 625 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 625 is deemed to contain allegations against Walmart, Walmart denies such allegations.

626. The allegations in Paragraph 626 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 626 is deemed to contain allegations against Walmart, Walmart denies such allegations.

627. The allegations in Paragraph 627 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 627 is deemed to contain allegations against Walmart, Walmart denies such allegations.

628. The allegations in Paragraph 628 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 628 is deemed to contain allegations against Walmart, Walmart denies such allegations.

629. The allegations in Paragraph 629 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 629 is deemed to contain allegations against Walmart, Walmart denies such allegations.

630. The allegations in Paragraph 630 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 630 is deemed to contain allegations against Walmart, Walmart denies such allegations.

631. The allegations in Paragraph 631 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 631 is deemed to contain allegations against Walmart, Walmart denies such allegations.

632. The allegations in Paragraph 632 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 632 is deemed to contain allegations against Walmart, Walmart denies such allegations.

633. The allegations in Paragraph 633 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 633 is deemed to contain allegations against Walmart, Walmart denies such allegations.

634. The allegations in Paragraph 634 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 634 is deemed to contain allegations against Walmart, Walmart denies such allegations.

635. The allegations in Paragraph 635 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 635 is deemed to contain allegations against Walmart, Walmart denies such allegations.

636. The allegations in Paragraph 636 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 636 is deemed to contain allegations against Walmart, Walmart denies such allegations.

637. The allegations in Paragraph 637 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 637 is deemed to contain allegations against Walmart, Walmart denies such allegations.

638. The allegations in Paragraph 638 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 638 is deemed to contain allegations against Walmart, Walmart denies such allegations.

639. The allegations in Paragraph 639 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 639 is deemed to contain allegations against Walmart, Walmart denies such allegations.

640. The allegations in Paragraph 640 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 640 is deemed to contain allegations against Walmart, Walmart denies such allegations.

641. The allegations in Paragraph 641 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 641 is deemed to contain allegations against Walmart, Walmart denies such allegations.

642. The allegations in Paragraph 642 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 642 is deemed to contain allegations against Walmart, Walmart denies such allegations.

643. The allegations in Paragraph 643 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 643 is deemed to contain allegations against Walmart, Walmart denies such allegations.

644. The allegations in Paragraph 644 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 644 is deemed to contain allegations against Walmart, Walmart denies such allegations.

645. The allegations in Paragraph 645 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 645 is deemed to contain allegations against Walmart, Walmart denies such allegations.

646. The allegations in Paragraph 646 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 646 is deemed to contain allegations against Walmart, Walmart denies such allegations.

647. The allegations in Paragraph 647 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 647 is deemed to contain allegations against Walmart, Walmart denies such allegations.

648. The allegations in Paragraph 648 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 648 is deemed to contain allegations against Walmart, Walmart denies such allegations.

649. The allegations in Paragraph 649 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 649 is deemed to contain allegations against Walmart, Walmart denies such allegations.

650. The allegations in Paragraph 650 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 650 is deemed to contain allegations against Walmart, Walmart denies such allegations.

651. The allegations in Paragraph 651 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore



deemed to be denied. Moreover, to the extent Paragraph 651 is deemed to contain allegations against Walmart, Walmart denies such allegations.

652. The allegations in Paragraph 652 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 652 is deemed to contain allegations against Walmart, Walmart denies such allegations.

653. The allegations in Paragraph 653 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 653 is deemed to contain allegations against Walmart, Walmart denies such allegations.

654. The allegations in Paragraph 654 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 654 is deemed to contain allegations against Walmart, Walmart denies such allegations.

655. The allegations in Paragraph 655 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 655 is deemed to contain allegations against Walmart, Walmart denies such allegations.

656. The allegations in Paragraph 656 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 656 is deemed to contain allegations against Walmart, Walmart denies such allegations.

657. The allegations in Paragraph 657 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 657 is deemed to contain allegations against Walmart, Walmart denies such allegations.

658. The allegations in Paragraph 658 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 658 is deemed to contain allegations against Walmart, Walmart denies such allegations.

659. The allegations in Paragraph 659 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 659 is deemed to contain allegations against Walmart, Walmart denies such allegations.

660. The allegations in Paragraph 660 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 660 is deemed to contain allegations against Walmart, Walmart denies such allegations.

661. The allegations in Paragraph 661 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 661 is deemed to contain allegations against Walmart, Walmart denies such allegations.

662. The allegations in Paragraph 662 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 662 is deemed to contain allegations against Walmart, Walmart denies such allegations.

663. The allegations in Paragraph 663 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 663 is deemed to contain allegations against Walmart, Walmart denies such allegations.

664. The allegations in Paragraph 664 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 664 is deemed to contain allegations against Walmart, Walmart denies such allegations.

665. The allegations in Paragraph 665 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 665 is deemed to contain allegations against Walmart, Walmart denies such allegations.

666. The allegations in Paragraph 666 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 666 is deemed to contain allegations against Walmart, Walmart denies such allegations.

667. Paragraph 667 refers to documents that speak for themselves, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 667.

668. Paragraph 668 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 668.

669. Paragraph 669 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 669.

670. The allegations in Paragraph 670 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 670 is deemed to contain allegations against Walmart, Walmart denies such allegations.

671. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 671; such allegations are therefore deemed to be denied.

672. Walmart admits certain prescriptions written in one state may, under some circumstances, be filled in a different state. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 672, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

673. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 673; such allegations are therefore deemed to be denied.

674. Paragraph 674 refers to documents that speak for themselves, and Walmart denies any characterizations thereof. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 674; such allegations are therefore deemed to be denied.

675. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 675; such allegations are therefore deemed to be denied.

676. Paragraph 676 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 676; such allegations are therefore deemed to be denied.

677. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 677; such allegations are therefore deemed to be denied.

678. Paragraph 678 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 678; such allegations are therefore deemed to be denied.

679. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 679; such allegations are therefore deemed to be denied.

680. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 680; such allegations are therefore deemed to be denied.

681. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 681; such allegations are therefore deemed to be denied.

682. Walmart denies the allegations in Paragraph 682 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 682, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

683. Walmart denies the allegations in Paragraph 683 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to

the truth of the allegations in Paragraph 683, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

684. Walmart denies the allegations in Paragraph 684 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 684, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

685. Walmart denies the allegations in Paragraph 685 to the extent they apply to Walmart, including that Walmart is or was a member of HDA and/or its predecessors HDMA and NWDA. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 685, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

686. Walmart denies the allegations in Paragraph 686 to the extent they apply to Walmart, including that Walmart is or was a member of HDA and/or its predecessors HDMA and NWDA. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 686, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

687. Walmart denies the allegations in Paragraph 687 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 687, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

688. Walmart denies the allegations in Paragraph 688 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to

the truth of the allegations in Paragraph 688, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

689. Walmart denies the allegations in Paragraph 689 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 689, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

690. Walmart admits that for a time period prior to May 2018, Walmart, through its subsidiary, distributed certain prescription controlled substances listed in Schedule II to certain retail pharmacies operated by Walmart and/or its subsidiaries in the United States. Walmart further admits that for a time period prior to July 2018, Walmart, through its subsidiary, distributed certain prescription controlled substances listed in Schedules III through V to certain retail pharmacies operated by Walmart and/or its subsidiaries in the United States. Walmart also admits that it dispensed certain prescription controlled substances to customers of certain retail pharmacies operated by Walmart and/or its subsidiaries in the United States with valid prescriptions. Further, Paragraph 690 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 690 and further denies the allegations contained therein to the extent they apply to Walmart. In addition, to the extent Paragraph 690 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 690, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

691. Paragraph 691 purports to recite law that speaks for itself, and Walmart denies any characterizations thereof. Paragraph 691 also states legal conclusions to which no response is



required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 691. Further, to the extent Paragraph 691 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

692. Paragraph 692 purports to recite law that speaks for itself, and Walmart denies any characterizations thereof. Paragraph 692 also states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 692. Further, to the extent Paragraph 692 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

693. Paragraph 693 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 693. Further, to the extent Paragraph 693 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 693, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

694. Paragraph 694 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 694 and further denies the allegations contained therein to the extent they apply to Walmart. Further, to the extent Paragraph 694 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 694, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

695. Paragraph 695 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 695 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 695, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

696. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 696; such allegations are therefore deemed to be denied.

697. Paragraph 697 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 697 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 697, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

698. While Walmart is aware of reports regarding drug overdose, Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 698; such allegations are therefore deemed to be denied.

699. Paragraph 699 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 699 and further denies the allegations contained therein to the extent they apply to Walmart. Further, to the extent Paragraph 556 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient

to form a belief as to the truth of the allegations in Paragraph 699, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

700. Paragraph 700 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 700 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 700, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

701. Walmart denies the allegations in Paragraph 701 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 701, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

702. Walmart denies the allegations in Paragraph 702 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 702, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

703. While Walmart is aware of reports regarding drug overdose, Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 703; such allegations are therefore deemed to be denied.

704. While Walmart is aware of reports regarding drug overdose, Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 704; such allegations are therefore deemed to be denied.

705. Paragraph 705 refers to documents that speak for themselves, and Walmart denies any characterizations thereof. While Walmart is aware of reports regarding drug overdose, Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 705; such allegations are therefore deemed to be denied.

706. Paragraph 706 refers to documents that speak for themselves, and Walmart denies any characterizations thereof. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 706; such allegations are therefore deemed to be denied.

707. Paragraph 707 refers to documents that speak for themselves, and Walmart denies any characterizations thereof. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 707; such allegations are therefore deemed to be denied.

708. Walmart acknowledges that abuse and addiction to opioids is a serious public health issue. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 708; such allegations are therefore deemed to be denied.

709. Paragraph 709 refers to documents that speak for themselves, and Walmart denies any characterizations thereof. While Walmart is aware of reports regarding drug overdose, Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 709; such allegations are therefore deemed to be denied.

710. While Walmart acknowledges that abuse and addiction to opioids is a serious public health issue, Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 710; such allegations are therefore deemed to be denied.

711. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 711; such allegations are therefore deemed to be denied.

712. Paragraph 712 refers to documents that speak for themselves, and Walmart denies any characterizations thereof. While Walmart is aware of reports regarding drug overdose, Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 712; such allegations are therefore deemed to be denied.

713. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 713; such allegations are therefore deemed to be denied.

714. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 714; such allegations are therefore deemed to be denied.

715. Walmart acknowledges that abuse and addiction to opioids is a serious public health issue. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 715; such allegations are therefore deemed to be denied.

716. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 716; such allegations are therefore deemed to be denied.

717. Walmart acknowledges that abuse and addiction to opioids is a serious public health issue. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 717; such allegations are therefore deemed to be denied.

718. Walmart acknowledges that abuse and addiction to opioids is a serious public health issue. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 718; such allegations are therefore deemed to be denied.

719. Walmart acknowledges that abuse and addiction to opioids is a serious public health issue. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 719; such allegations are therefore deemed to be denied.

720. Paragraph 720 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 720 and further denies the allegations contained therein to the extent they apply to Walmart. To the extent Paragraph 720 contains allegations of wrongdoing, Walmart denies such allegations. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 720, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

721. Paragraph 721 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 721 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 721, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

722. Paragraph 722 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 722 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the

allegations in Paragraph 722, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

723. Paragraph 723 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 723 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 723, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

724. Paragraph 724 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 724 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 724, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

725. Paragraph 725 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 725 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 725, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

726. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 726; such allegations are therefore deemed to be denied.

727. Paragraph 727 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 727 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 727, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

728. Paragraph 728 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 728 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 728, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

729. Walmart incorporates by reference its answers to all other allegations contained in this Answer as if fully set forth herein. Pursuant to Paragraph 4 of the Stipulated Order Regarding Answering The May 19, 2021 Amended Complaints In The Five New Pharmacy Bellwether Cases entered August 17, 2021 (MDL Dkt. 3853), Walmart is only required to answer the allegations set forth in this Complaint and does not respond to any allegations in Plaintiff's prior complaints and pleadings including Plaintiff's Original Complaint (ECF 1), its Amended Short Form Complaint (ECF 6), or any other complaints or pleadings that Plaintiff purports to incorporate herein. Walmart does not admit any allegation contained in any of Plaintiff's prior complaints and pleadings. Answering further, to the extent any of Plaintiff's prior pleadings contain allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.



730. Pursuant to Paragraph 4 of the Stipulated Order Regarding Answering The May 19, 2021 Amended Complaints In The Five New Pharmacy Bellwether Cases entered August 17, 2021 (MDL Dkt. 3853), Walmart is only required to answer the allegations set forth in this Complaint and does not respond to any allegations in Plaintiff's prior complaints and pleadings including Plaintiff's Original Complaint (ECF 1), its Amended Short Form Complaint (ECF 6), or any other complaints or pleadings that Plaintiff purports to incorporate herein. Walmart does not admit any allegation contained in any of Plaintiff's prior complaints and pleadings. Answering further, to the extent any of Plaintiff's prior pleadings contain allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

731. Paragraph 731 is a recitation of case procedure and does not require a response.

732. Paragraph 732 summarizes Plaintiff's claims and does not require a response. To the extent Paragraph 732 contains allegations of wrongdoing, Walmart denies such allegations.

733. Walmart incorporates by reference its answers to all other allegations contained in this Answer as if fully set forth herein. Pursuant to Paragraph 4 of the Stipulated Order Regarding Answering The May 19, 2021 Amended Complaints In The Five New Pharmacy Bellwether Cases entered August 17, 2021 (MDL Dkt. 3853), Walmart is only required to answer the allegations set forth in this Complaint and does not respond to any allegations in Plaintiff's prior complaints and pleadings including Plaintiff's Original Complaint (ECF 1), its Amended Short Form Complaint (ECF 6), or any other complaints or pleadings that Plaintiff purports to incorporate herein. Walmart does not admit any allegation contained in any of Plaintiff's prior complaints and pleadings. Answering further, to the extent any of Plaintiff's prior pleadings contain allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

734. Walmart admits that the County Attorney of Cobb County, Georgia purports to bring this claim on behalf of the citizens of Cobb County. Responding further, Paragraph 734 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 734. To the extent Paragraph 734 contains allegations of wrongdoing, Walmart denies such allegations. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 734, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

735. Paragraph 735 purports to recite law that speaks for itself, and Walmart denies any characterizations thereof. To the extent Paragraph 735 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

736. Paragraph 736 purports to recite law that speaks for itself, and Walmart denies any characterizations thereof. To the extent Paragraph 736 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

737. Paragraph 737 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 737 and further denies the allegations contained therein to the extent they apply to Walmart. While Walmart acknowledges that abuse and addiction to opioids is a serious public health issue, Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 737, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

738. Walmart admits that for a time period prior to May 2018, Walmart, through its subsidiary, distributed certain prescription controlled substances listed in Schedule II to certain

retail pharmacies operated by Walmart and/or its subsidiaries in the United States. Walmart further admits that for a time period prior to July 2018, Walmart, through its subsidiary, distributed certain prescription controlled substances listed in Schedules III through V to certain retail pharmacies operated by Walmart and/or its subsidiaries in the United States. Walmart also admits that it dispensed certain prescription controlled substances to customers of certain retail pharmacies operated by Walmart and/or its subsidiaries in the United States with valid prescriptions. Further, Paragraph 738 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 738 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 738, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

739. Walmart admits that for a time period prior to May 2018, Walmart, through its subsidiary, distributed certain prescription controlled substances listed in Schedule II to certain retail pharmacies operated by Walmart and/or its subsidiaries in the United States. Walmart further admits that for a time period prior to July 2018, Walmart, through its subsidiary, distributed certain prescription controlled substances listed in Schedules III through V to certain retail pharmacies operated by Walmart and/or its subsidiaries in the United States. Walmart also admits that it dispensed certain prescription controlled substances to customers of certain retail pharmacies operated by Walmart and/or its subsidiaries in the United States with valid prescriptions. Walmart denies the remaining allegations in Paragraph 739 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the

allegations in Paragraph 739, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

740. Walmart admits that for a time period prior to May 2018, Walmart, through its subsidiary, distributed certain prescription controlled substances listed in Schedule II to certain retail pharmacies operated by Walmart and/or its subsidiaries in the United States. Walmart further admits that for a time period prior to July 2018, Walmart, through its subsidiary, distributed certain prescription controlled substances listed in Schedules III through V to certain retail pharmacies operated by Walmart and/or its subsidiaries in the United States. Walmart also admits that it dispensed certain prescription controlled substances to customers of certain retail pharmacies operated by Walmart and/or its subsidiaries in the United States with valid prescriptions. Walmart denies the remaining allegations in Paragraph 740 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 740, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

741. Walmart admits that for a time period prior to May 2018, Walmart, through its subsidiary, distributed certain prescription controlled substances listed in Schedule II to certain retail pharmacies operated by Walmart and/or its subsidiaries in the United States. Walmart further admits that for a time period prior to July 2018, Walmart, through its subsidiary, distributed certain prescription controlled substances listed in Schedules III through V to certain retail pharmacies operated by Walmart and/or its subsidiaries in the United States. Walmart also admits that it dispensed certain prescription controlled substances to customers of certain retail pharmacies operated by Walmart and/or its subsidiaries in the United States with valid prescriptions. Paragraph 741 otherwise states legal conclusions to which no response is required. To the extent a response

is required, Walmart denies the legal conclusions stated in Paragraph 741 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 741, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

742. Walmart admits that at all times relevant to this litigation, it possessed certain data on prescription medication it distributed and dispensed. Walmart denies the remaining allegations in Paragraph 742 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 742, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

743. Paragraph 743 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 743 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 743, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

744. Walmart denies the allegations in Paragraph 744 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 744, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

745. Paragraph 745 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 745 and

further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 745, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

746. Paragraph 746 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 746 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 746, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

747. Paragraph 747 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 747 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 747, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

748. Paragraph 748 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 748 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 748, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

749. Paragraph 749 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 749 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 749, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

750. Paragraph 750 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 750 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 750, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

751. Paragraph 751 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 751 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 751, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

752. Paragraph 752 summarizes Plaintiff's claims and does not require a response. To the extent Paragraph 752 contains allegations of wrongdoing, Walmart denies such allegations. Further, Paragraph 752 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 752 and further denies the allegations contained therein to the extent they apply to Walmart. Walmart is otherwise

without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 752, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

753. Walmart denies that Plaintiff is entitled the relief described in Paragraph 753.

754. Paragraph 754 summarizes Plaintiff's request for a jury and does not require a response.

### **AFFIRMATIVE AND OTHER DEFENSES**

Having answered the allegations of Plaintiff's Supplemental Short Form Complaint, and having denied any liability whatsoever, Walmart further denies any allegations that have not been expressly admitted and sets forth below its defenses to Plaintiff's Fourth Claim of Relief—Public Nuisance claim outlined above. By setting forth these defenses, Walmart does not assume the burden of proving any fact, issue, or element of a cause of action where such burden properly belongs to Plaintiff. Moreover, Walmart does not intend these defenses to be, nor shall they be construed as, an acknowledgement that any particular issue or subject matter is relevant to Plaintiff's allegations. Walmart does not admit or acknowledge that it bears the burden of proof or burden of persuasion with respect to any such defense. Upon completion of discovery, if the facts warrant, Walmart may withdraw any of these defenses as may be appropriate. Walmart reserves the right to (i) rely on any other applicable defenses set forth in any Answer or listing of affirmative defenses of any other Defendant in this Action, (ii) rely on any other defenses that may become apparent during fact or expert discovery in this matter, and (iii) amend its Answer to assert any such defenses.

### **FIRST DEFENSE**

The Complaint fails to state facts sufficient to constitute a claim upon which relief may be granted against Walmart.



**SECOND DEFENSE**

Plaintiff's claim is barred by the applicable statute of limitations.

**THIRD DEFENSE**

Plaintiff's claim is barred by the applicable statute of repose.

**FOURTH DEFENSE**

Plaintiff's claim is barred by the doctrine of laches.

**FIFTH DEFENSE**

Plaintiff's claim is barred or limited for lack of standing.

**SIXTH DEFENSE**

Plaintiff's claim is barred by the voluntary payment doctrine.

**SEVENTH DEFENSE**

Plaintiff's claim is barred, in whole or in part, because Plaintiff lacks capacity to bring its claim.

**EIGHTH DEFENSE**

Plaintiff's claim is barred because Plaintiff is not the real party in interest.

**NINTH DEFENSE**

Plaintiff's claim is not ripe and/or has been mooted.

**TENTH DEFENSE**

Plaintiff's claim and damages are barred or limited, in whole or in part, by common law, statutory, and state constitutional constraints on the exercise of police powers.

**ELEVENTH DEFENSE**

Plaintiff's claim and damages are barred or limited by the political question, separation of powers, and statewide concern doctrines and because the claim implicates issues of statewide importance that is reserved for state regulation.

**TWELFTH DEFENSE**

Plaintiff's claim is barred by the doctrine of unclean hands.

**THIRTEENTH DEFENSE**

Plaintiff's claim is barred by the doctrine of *in pari delicto*.

**FOURTEENTH DEFENSE**

Plaintiff's claim is barred, in whole or in part, for failure to exhaust administrative remedies or to satisfy other procedural prerequisites.

**FIFTEENTH DEFENSE**

Plaintiff's claim is barred by the doctrines of estoppel, waiver, and/or ratification.

**SIXTEENTH DEFENSE**

Plaintiff's claim is barred by the doctrines of res judicata and collateral estoppel.

**SEVENTEENTH DEFENSE**

Venue may be improper and/or inconvenient in this Court.

**EIGHTEENTH DEFENSE**

Plaintiff's claim is barred or limited by the terms and effect of any applicable consent judgment or settlement, including by operation of the doctrines of res judicata and collateral estoppel, failure to fulfill conditions precedent, failure to provide requisite notice, payment, accord and satisfaction, and compromise and settlement.

**NINETEENTH DEFENSE**

Plaintiff has failed to join all necessary parties, including without limitation health care providers, prescribers, patients, and other third parties whom Plaintiff alleges engaged in the unauthorized or illicit prescribing, dispensing, diversion, or use of prescription opioid products.

**TWENTIETH DEFENSE**

Plaintiff's claim against Walmart does not arise out of the same transactions or occurrences as the claims against other Defendants, as required for joinder of parties.

**TWENTY-FIRST DEFENSE**

Plaintiff's claims are barred to the extent they relate to Walmart's alleged lobbying or other activities protected by the First Amendment to the Constitution of the United States or by Article 1, Section 1, Paragraphs V–VI and IX of the Constitution of the State of Georgia or the constitution of any other state whose laws may apply.

**TWENTY-SECOND DEFENSE**

Plaintiff's claim is barred, in whole or in part, to the extent that it violates the Due Process or Ex Post Facto clauses of the United States or Georgia constitutions.

**TWENTY-THIRD DEFENSE**

Walmart's rights under the Due Process Clause of the U.S. Constitution and Georgia Constitution or statute are violated by any financial or other arrangement that might distort a government attorney's duty to pursue justice rather than his or her personal interests, financial or otherwise, in the context of a civil enforcement proceeding, including by Plaintiff's use of a contingency-fee contract with private counsel.

**TWENTY-FOURTH DEFENSE**

Plaintiff's claim is barred, in whole or in part, to the extent that it violates the Dormant Commerce Clause of the United States Constitution.

**TWENTY-FIFTH DEFENSE**

Walmart denies all types of causation, including without limitation, cause in fact, proximate cause, and producing cause, with respect to the claim asserted against Walmart.

**TWENTY-SIXTH DEFENSE**

Plaintiff's claim is barred, in whole or in part, because Walmart did not proximately cause the damages complained of, and because the acts of other persons (including individuals engaged in the illegal distribution or use of opioids without a proper prescription) intervened between Walmart's acts and Plaintiff's harms. Walmart had no legal duty to protect Plaintiff from the intentional criminal acts of third persons, which are superseding causes that extinguish any liability.

**TWENTY-SEVENTH DEFENSE**

The injuries and damages claimed by Plaintiff resulted from an intervening or superseding cause and/or causes, and any act or omission on the part of Walmart was not the proximate and/or competent producing cause of such alleged injuries and damages.

**TWENTY-EIGHTH DEFENSE**

Plaintiff's injuries and damages, if any, were due to misuse, illicit use, or abuse of the medications at issue on the part of the medication users, for which Walmart is not liable.

**TWENTY-NINTH DEFENSE**

Any injuries and/or damages sustained by Plaintiff may have been caused or contributed to by the negligence or actual conduct of Plaintiff and/or other persons, firms, corporations, or entities over whom Walmart had no control or right of control and for whom it is not responsible.

**THIRTIETH DEFENSE**

Plaintiff's claim is barred, in whole or in part, because its alleged injuries or damages were caused by unforeseeable and uncontrollable forces over which Walmart had no control and for which Walmart is not responsible, including without limitation pre-existing or unrelated medical conditions.

**THIRTY-FIRST DEFENSE**

Plaintiff's claim is barred, in whole or in part, because any and all damages alleged by Plaintiff were caused by misuse of the products involved, failure to use the products properly, and/or alteration or modification of, or criminal misuse or abuse of, the prescribed medications by third parties over whom Walmart had no control, for whom Walmart is not responsible, and that operated as superseding causes that extinguish any liability.

**THIRTY-SECOND DEFENSE**

Plaintiff would be unjustly enriched if allowed to recover on its claim.

**THIRTY-THIRD DEFENSE**

Plaintiff's claim is barred in whole or in part because Plaintiff suffered no injuries or damages as a result of any action by Walmart.

**THIRTY-FOURTH DEFENSE**

Plaintiff's claim is barred, in whole or in part, because the remoteness doctrine and derivative-injury rule bar Plaintiff from recovering payments that it allegedly made on behalf of its residents to reimburse any expenses for health care, pharmaceutical care, and/or other public services.

**THIRTY-FIFTH DEFENSE**

Plaintiff's claim is barred to the extent that Walmart has valid defenses that bar recovery by those persons on whose behalf Plaintiff purportedly seeks recovery.

**THIRTY-SIXTH DEFENSE**

Plaintiff's claim is subject to all defenses that could be asserted if Plaintiff's claim were properly made by individuals on whose behalf or for whose alleged damages Plaintiff seeks to recover.

**THIRTY-SEVENTH DEFENSE**

Plaintiff has failed to comply with the requirement that it identify each patient in whose claim(s) it has a subrogation interest and on whose behalf it has incurred costs.

**THIRTY-EIGHTH DEFENSE**

Plaintiff fails to plead that it reimbursed any prescriptions for any opioid distributed by Walmart that harmed patients and should not have been prescribed or distributed, that Walmart caused any health care provider to write any ineffective or harmful opioid prescriptions, or that any specific prescription was unauthorized, medically unnecessary, ineffective, or harmful.

**THIRTY-NINTH DEFENSE**

Plaintiff's claim is barred to the extent that Plaintiff's alleged damages are speculative, uncertain, and hypothetical.

**FORTIETH DEFENSE**

Any recovery by Plaintiff may be barred, in whole or in part, by the principle of comparative or contributory fault.

**FORTY-FIRST DEFENSE**

Any recovery against Walmart is barred or limited under the principles of assumption of the risk and informed consent.

**FORTY-SECOND DEFENSE**

Plaintiff's damages, if any, were caused by the active, direct, and proximate negligence or actual conduct of entities or persons other than Walmart, and in the event that Walmart is found to be liable to Plaintiff, Walmart will be entitled to indemnification, contribution, and/or apportionment.

**FORTY-THIRD DEFENSE**

Walmart asserts its right to a proportionate reduction of any damages found against Walmart based on the negligence or other conduct of any settling tortfeasor and/or responsible third party and/or Plaintiff.

**FORTY-FOURTH DEFENSE**

A specific percentage of the tortious conduct that proximately caused the injury or loss to person or property is attributable to (i) Plaintiff, (ii) other parties from whom Plaintiff seeks recovery, and (iii) persons from whom Plaintiff does not seek recovery in this action, including, but not limited to, prescribing practitioners, non-party pharmacies and pharmacists, individuals and entities involved in diversion and distribution of prescription opioids, individuals and entities involved in import, distribution, and sale of illegal opioids, individuals involved in procuring diverted prescription opioids and/or illegal drugs, delivery services, federal, state, and local government entities, and health insurers and pharmacy benefit managers. Ga. Code §§ 51-11-7 and 51-12-33.

**FORTY-FIFTH DEFENSE**

Any verdict or judgment that might be recovered by Plaintiff must be reduced by those amounts that have already indemnified or with reasonable certainty will indemnify Plaintiff in whole or in part for any past or future claimed economic loss from any collateral source or any other applicable law.

**FORTY-SIXTH DEFENSE**

If Walmart is found liable for Plaintiff's alleged injuries and losses (such liability is specifically denied), the facts will show that Walmart caused fifty percent or less of the conduct that proximately caused such injuries or loss and is liable only for its proportionate share of the damages that represent economic loss. *See* Ga. Code § 51-12-33. Any recovery by Plaintiff must

be reduced pursuant to Section 51-12-33 to account for the acts or omissions attributable to Plaintiff.

**FORTY-SEVENTH DEFENSE**

The extent to which Plaintiff may be entitled to recover any punitive damages if liability is established (which liability is specifically denied) are capped pursuant to Ga. Code § 51-12-5.1(g).

**FORTY-EIGHTH DEFENSE**

Any damages that Plaintiff may recover against Walmart must be reduced to the extent that Plaintiff is seeking damages for alleged injuries or expenses related to the same user(s) of the subject drugs, or damages recovered or recoverable by another actual or potential plaintiff. Any damages that Plaintiff may recover against Walmart must be reduced to the extent they unjustly enrich Plaintiff.

**FORTY-NINTH DEFENSE**

Plaintiff's claim against Walmart is barred to the extent it relies, explicitly or implicitly, on a theory of market-share liability.

**FIFTIETH DEFENSE**

Plaintiff's claim against Walmart is barred or limited by the economic loss rule.

**FIFTY-FIRST DEFENSE**

Plaintiff is barred, in whole or in part, from recovering costs incurred in providing public services by the free public services and/or municipal cost recovery doctrine.

**FIFTY-SECOND DEFENSE**

Plaintiff may have failed or refused to exercise reasonable care and diligence to avoid loss and minimize damages and, therefore, may not recover for losses that could have been prevented by reasonable efforts on its part, or by expenditures that might reasonably have been made. Recovery, if any, should therefore be reduced by Plaintiff's failure to mitigate damages, if any.



**FIFTY-THIRD DEFENSE**

To the extent Plaintiff attempts to seek equitable relief, Plaintiff is not entitled to such relief because Plaintiff has an adequate remedy at law.

**FIFTY-FOURTH DEFENSE**

Plaintiff's claim is barred, in whole or in part, because federal agencies have exclusive or primary jurisdiction over the matters asserted in the Complaint.

**FIFTY-FIFTH DEFENSE**

Plaintiff's claim is preempted by federal law, including (without limitation) the federal Controlled Substances Act and the Food, Drug, and Cosmetic Act ("FDCA").

**FIFTY-SIXTH DEFENSE**

The conduct of Walmart conformed with the FDCA and the requirements of the Food and Drug Administration ("FDA"), and the activities of Walmart alleged in the Complaint conformed with all state and federal statutes, regulations, and industry standards based on the state of knowledge at the relevant time(s) alleged in the Complaint.

**FIFTY-SEVENTH DEFENSE**

Plaintiff's claim is barred, in whole or in part, by conflict preemption as set forth in the United States Supreme Court's decisions in *PLIVA, Inc. v. Mensing*, 564 U.S. 604 (2011), and *Mutual Pharm. Co. v. Bartlett*, 570 U.S. 472 (2013).

**FIFTY-EIGHTH DEFENSE**

Plaintiff's claim is preempted insofar as it conflicts with Congress's purposes and objectives in enacting relevant federal legislation and authorizing regulations, including the Hatch-Waxman Amendments to the FDCA and implementing regulations. *See Geier v. Am. Honda Co.*, 529 U.S. 861 (2000).

**FIFTY-NINTH DEFENSE**

To the extent Plaintiff's claim depends solely on violations of federal law, including any claim of a "fraud on the FDA" with respect to the manufacturers' disclosure of information related to the safety of their medications at issue, such claim is barred and should be dismissed. *See Buckman v. Plaintiff's Legal Comm'n*, 531 U.S. 341 (2001).

**SIXTIETH DEFENSE**

To the extent Plaintiff's claim depends solely on violations of federal law, including any claim of "fraud on the Drug Enforcement Administration" ("DEA") with respect to Walmart's compliance with statutes or regulations administered and/or enforced by the DEA, such claim is barred and should be dismissed. *See id.*

**SIXTY-FIRST DEFENSE**

Plaintiff's claim is barred, in whole or in part, by the deference that common law accords discretionary actions by the FDA under the FDCA and discretionary actions by the DEA under the Controlled Substances Act.

**SIXTY-SECOND DEFENSE**

If Plaintiff incurred the damages alleged, which is expressly denied, Walmart is not liable for damages because the methods, standards, or techniques of designing, manufacturing, labeling, and distributing the prescription medications at issue complied with and were in conformity with the laws and regulations of the Controlled Substances Act, the FDCA, and the generally recognized state of the art in the industry at the time the product was designed, manufactured, labeled, and distributed.

**SIXTY-THIRD DEFENSE**

Plaintiff's claim is barred to the extent it is based on any allegations involving failure to provide adequate warnings or information because all warnings or information that accompanied

the allegedly distributed products were approved by the United States Food & Drug Administration for a product approved under the Federal Food, Drug, and Cosmetic Act (21 U.S.C. § 301 *et seq.*), as amended, or Section 351, Public Health Service Act (42 U.S.C. § 262), as amended, or the warnings and information provided were those stated in monographs developed by the United States Food & Drug Administration for pharmaceutical products that may be distributed without an approved new drug application.

**SIXTY-FOURTH DEFENSE**

Plaintiff's claim is barred in whole or in part by the learned intermediary doctrine.

**SIXTY-FIFTH DEFENSE**

Walmart did not owe or breach any statutory or common law duty to Plaintiff.

**SIXTY-SIXTH DEFENSE**

Walmart appropriately, completely, and fully performed and discharged any and all obligations and legal duties arising out of the matters alleged in the Complaint.

**SIXTY-SEVENTH DEFENSE**

Plaintiff's claim is barred, in whole or in part, because it is directed at authorized and regulated activities, and Walmart complied at all relevant times with all applicable laws, including all legal and regulatory duties.

**SIXTY-EIGHTH DEFENSE**

To the extent that Plaintiff relies on letters or other informal guidance from the DEA to establish Walmart's regulatory duties, such informal guidance cannot enlarge Walmart's regulatory duties in the absence of compliance by DEA with the requirements by the Administrative Procedure Act, 5 U.S.C. § 551 *et seq.*

**SIXTY-NINTH DEFENSE**

Plaintiff's claim is barred to the extent it is based on alleged violations of the Georgia Controlled Substances Act or other statutes or rules under which there is no private right of action against Walmart.

**SEVENTIETH DEFENSE**

Plaintiff's claim is barred to the extent it is based on alleged violations of industry customs because purported industry customs do not create legal duties on Walmart.

**SEVENTY-FIRST DEFENSE**

Plaintiff's claim is barred, in whole or in part, by the Restatement (Second) of Torts § 402A, Comments j and k, and Restatement (Third) of Torts: Products Liability § 6.

**SEVENTY-SECOND DEFENSE**

Walmart is not liable for any statements in opioid manufacturers' branded or unbranded materials.

**SEVENTY-THIRD DEFENSE**

Plaintiff's claim is barred to the extent that it lacks the statutory authority to bring a nuisance claim under Georgia law or its own applicable county codes or regulations.

**SEVENTY-FOURTH DEFENSE**

Plaintiff's public nuisance claim is barred or limited to the extent that it has been abrogated or otherwise curtailed by Georgia Code Section 51.1.11, *et seq.*

**SEVENTY-FIFTH DEFENSE**

Plaintiff's claim of public nuisance is barred or limited because it does not allege an interference with private property; illegal conduct perpetrated by third parties involving the use of an otherwise legal product does not involve a public right that supports a claim for public nuisance;

the alleged public nuisance would have impermissible extraterritorial reach; and the alleged conduct of Walmart is too remote from the alleged injury as a matter of law and due process.

**SEVENTY-SIXTH DEFENSE**

Plaintiff's claim is barred by the Due Process Clause of the Fifth and Fourteenth Amendments to the U.S. Constitution and Article 1, § 8 of the Georgia Constitution because substantive due process forbids the retroactive imposition of changing and unclear legal interpretations of the Controlled Substances Act or other applicable Georgia law.

**SEVENTY-SEVENTH DEFENSE**

Plaintiff's public nuisance claim is barred because there is no enforceable duty to monitor and halt apparently suspicious orders before shipping.

**SEVENTY-EIGHTH DEFENSE**

Plaintiff's public nuisance claim is barred to the extent it seeks to establish liability based on unlawful conduct with respect to the dispensing of prescription opioid medications because neither the Controlled Substances Act nor equivalent Georgia law imposes relevant corporate-level dispensing duties.

**SEVENTY-NINTH DEFENSE**

Plaintiff's public nuisance claim is barred because the alleged conduct of Walmart's distribution and dispensing activity was not alleged to have harmed all or even most people who came into contact with it.

**EIGHTIETH DEFENSE**

Plaintiff's public nuisance claim is barred because Plaintiff fails to allege a common right of all members of the public that is alleged to have been infringed upon.

**EIGHTY-FIRST DEFENSE**

Plaintiff's claim is barred, reduced, and/or limited pursuant to the applicable Georgia statutory and common law regarding limitations of awards, caps on recovery, and setoffs.

**EIGHTY-SECOND DEFENSE**

Plaintiff's claim is barred, reduced, and/or limited to the extent that Walmart is entitled to a credit or setoff for any and all sums Plaintiff has received in the way of any and all settlements.

**EIGHTY-THIRD DEFENSE**

Plaintiff's Complaint is barred, in whole or in part, by the doctrines of acquiescence, settlement, or release.

**EIGHTY-FOURTH DEFENSE**

Walmart's liability, if any, will not result from its conduct but is solely the result of an obligation imposed by law, and thus Walmart is entitled to complete indemnity, express or implied, by other parties.

**EIGHTY-FIFTH DEFENSE**

Plaintiff's request, if any, for punitive or exemplary damages or other civil penalties is barred or reduced by applicable law or statute or, in the alternative, such damages or penalties are unconstitutional insofar as they violate the Due Process Clauses of the United States Constitution, the Excessive Fines Clause of the Eighth Amendment of the United States Constitution, the Full Faith and Credit Clause of the United States Constitution, the Double Jeopardy Clause of the Fifth Amendment to the United States Constitution, the Equal Protection Clause of the Fourteenth Amendment to the United States Constitution, the Sixth Amendment to the United States Constitution, and applicable provisions of the Constitution of Georgia or that of any other state whose laws may apply. Any law, statute, or other authority purporting to permit the recovery of

punitive damages or civil penalties in this case is unconstitutional, facially and as applied, to the extent that, without limitation, it:

- (1) lacks constitutionally sufficient standards to guide and restrain the jury's discretion in determining whether to award punitive damages or civil penalties and/or the amount, if any;
- (2) is void for vagueness in that it fails to provide adequate advance notice as to what conduct will result in punitive damages or civil penalties;
- (3) unconstitutionally may permit recovery of punitive damages or civil penalties based on harms to third parties, out-of-state conduct, conduct that complied with applicable law, or conduct that was not directed, or did not proximately cause harm, to Plaintiff;
- (4) permits the imposition of punitive damages where the burden of proof is less than clear and convincing evidence;
- (5) permits the imposition of punitive damages without bifurcating the trial and trying all punitive damages issues separately, only if and after a finding on the merits of the liability of the Walmart;
- (6) permits the imposition of punitive damages without any predetermined limit on any such award;
- (7) permits an imposition of punitive damages that allows for multiple punishments for the same alleged act(s) or omission(s);
- (8) unconstitutionally may permit recovery of punitive damages or civil penalties in an amount that is not both reasonable and proportionate to the amount of harm, if any, to Plaintiff and to the amount of compensatory damages, if any;

- (9) unconstitutionally may permit jury consideration of net worth or other financial information relating to Defendants;
- (10) lacks constitutionally sufficient standards to be applied by the trial court in post-verdict review of any award of punitive damages or civil penalties;
- (11) lacks constitutionally sufficient standards for appellate review of any award of punitive damages or civil penalties;
- (12) would unconstitutionally impose a penalty, criminal in nature, without according to Defendants the same procedural protections that are accorded to criminal defendants under the constitutions of the United States, this State, and any other state whose laws may apply; and
- (13) otherwise fails to satisfy Supreme Court precedent, including, without limitation, *Pacific Mut. Life Ins. Co. v. Haslip*, 499 U.S. 1 (1991); *TXO Production Corp. v. Alliance Resources, Inc.*, 509 U.S. 443 (1993); *BMW of N. Am. v. Gore*, 517 U.S. 559 (1996); *State Farm Ins. Co. v. Campbell*, 538 U.S. 408 (2003); and *Philip Morris USA v. Williams*, 549 U.S. 346 (2007).

#### **EIGHTY-SIXTH DEFENSE**

To the extent that Plaintiff seeks punitive, exemplary, or aggravated damages, any such damages are barred because the product at issue, and its labeling, were subject to and received pre-market approval by the FDA under 52 Stat. 1040, 21 U.S.C. § 301.

#### **EIGHTY-SEVENTH DEFENSE**

Plaintiff's request, if any, for punitive or exemplary damages is barred because Plaintiff cannot prove by clear and convincing evidence that Walmart's actions showed willful misconduct, malice, fraud, wantonness, oppression, or entire want of care which would raise the presumption



of conscious indifference to consequences, and Walmart has neither acted nor failed to act in a manner that entitles Plaintiff to recover punitive or exemplary damages.

**EIGHTY-EIGHTH DEFENSE**

Plaintiff cannot obtain relief on its claim based on actions undertaken by Walmart of which Walmart provided notice of all material facts.

**EIGHTY-NINTH DEFENSE**

Walmart is entitled to, and claims the benefit of, all defenses and presumptions set forth in or arising from any rule of law or statute of Georgia or any other state whose substantive law might control the action.

**NINETIETH DEFENSE**

Walmart asserts all applicable defenses under Federal Rules of Civil Procedure 8(c) and 12(b) and/or Georgia Code Sections 9-11-8 and 9-11-12, as investigation and discovery proceeds.

**NINETY-FIRST DEFENSE**

To the extent they are not otherwise incorporated herein, Walmart incorporates as a defense the defenses and arguments raised in Publix Super Markets, Inc.'s Motion to Dismiss (Dkt. No. 28). Plaintiff's claim is barred because, as interpreted in *State ex rel. Boykin v. Ball Inv. Co.*, 191 Ga. 382 (Ga. 1940), Georgia law does not recognize a public nuisance claim when the statute governing the relevant activity does not include such a cause of action.

**NINETY-SECOND DEFENSE**

Walmart adopts by reference any additional applicable defense pled by any other Defendant not otherwise pled herein.

**NINETY-THIRD DEFENSE**

Plaintiff's public nuisance claim is precluded by Georgia's comprehensive regulation of drugs of abuse.

**JURY DEMAND**

Walmart hereby requests a jury trial as to all issues or claims triable in this action.

**PRAYER FOR RELIEF**

WHEREFORE, Walmart prays for relief from judgment from Plaintiff as follows:

1. Plaintiff take nothing by reason of this Complaint;
2. Walmart recovers its costs and attorneys' fees incurred herein; and
3. For such further and other relief as the Court deems proper.

Dated: October 12, 2021

Respectfully submitted,

/s/ Tara A. Fumerton

Tara A. Fumerton

Tina M. Tabacchi

JONES DAY

77 West Wacker

Chicago, IL 60601

Phone: (312) 269-4335

Fax: (312) 782-8585

E-mail: [tmtabacchi@jonesday.com](mailto:tmtabacchi@jonesday.com)

E-mail: [tfumerton@jonesday.com](mailto:tfumerton@jonesday.com)

*Attorneys for Walmart Inc.*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on October 12, 2021, the foregoing was filed using the Court's CM/ECF filing system and will be served via the Court's CM/ECF filing system on all attorneys of record.

Dated: October 12, 2021

Respectfully submitted,

*s/ Tara A. Fumerton*

---

Tara A. Fumerton